

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GRAHAM CHASE ROBINSON,

Plaintiff,

-against-

Case No. 1:19-cv-09156 (LJL) (KHP)

ROBERT DE NIRO AND CANAL PRODUCTIONS, INC.,

Defendants.

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EXAMINATION BEFORE TRIAL of the Plaintiff,
GRAHAM CHASE ROBINSON, taken by the Defendant, pursuant
to Notice, held via REMOTE PROCEEDINGS, on February 9,
2022, at 10:00 a.m., before a Notary Public of the State
of New York.

CONFIDENTIAL

1 A P P E A R A N C E S:

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13 CANAL PRODUCTIONS, INC.

1350 Broadway

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15 BY: LAURENT S. DROGIN, ESQ.

BRITTANY K. LAZZARO, ESQ.

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18

ALSO PRESENT:

19

NATE LANINGHAM-Videographer

20 Magna Legal Services

21 THOMAS HARVEY, ESQ.-for Robert De Niro

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1 S T I P U L A T I O N S :

2 IT IS STIPULATED AND AGREED by and between the attorneys
3 for the respective parties herein, and in compliance
4 with Rule 221 of the Uniform Rules for the Trial Courts:
5 THAT the parties recognize the provision of Rule 3115
6 subdivisions (b), (c) and/or (d). All objections made
7 at a deposition shall be noted by the officer before
8 whom the deposition is taken, and the answer shall be
9 given and the deposition shall proceed subject to the
10 objections and to the right of a person to apply for
11 appropriate relief pursuant to Article 31 of the CPLR;
12 THAT every objection raised during a deposition shall be
13 stated succinctly and framed so as not to suggest an
14 answer to the deponent and, at the request of the
15 questioning attorney, shall include a clear statement as
16 to any defect in form or other basis of error or
17 irregularity. Except to the extent permitted by CPLR
18 Rule 3115 or by this rule, during the course of the
19 examination persons in attendance shall not make
20 statements or comments that interfere with the
21 questioning.

22 THAT a deponent shall answer all questions at a
23 deposition, except (i) to preserve a privilege or right
24 of confidentiality, (ii) to enforce a limitation set
25 forth in an order of a court, or (iii) when the question
is plainly improper and would, if answered, cause
significant prejudice to any person. An attorney shall
not direct a deponent not to answer except as provided
in CPLR Rule 3115 or this subdivision. Any refusal to
answer or direction not to answer shall be accompanied
by a succinct and clear statement on the basis
therefore. If the deponent does not answer a question,
the examining party shall have the right to complete the
remainder of the deposition.

26 THAT an attorney shall not interrupt the deposition for
27 the purpose of communicating
28 with the deponent unless all parties consent or the
29 communication is made for the purpose of determining
30 whether the question should not be answered on the
31 grounds set forth in Section
32 221.2 of these rules, and, in such event, the reason for
33 the communication shall be stated for the record
34 succinctly and clearly.

1 THAT the failure to object to any question or to move to
2 strike any testimony at this examination shall not be a
3 bar or waiver to make such objection or motion at the
4 time of the trial of this action, and is hereby
5 reserved; and

6 THAT this examination may be signed and sworn to by the
7 witness examined herein before any Notary Public, but
8 the failure to do so or to return the original of the
9 examination to the attorney on whose behalf the
10 examination is taken, shall not be deemed a waiver of
11 the rights provided by Rule 3116 and 3117 of the CPLR,
12 and shall be controlled thereby; and

13 THAT the certification and filing of the original of
14 this examination are hereby waived; and

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16 THAT the questioning attorney shall provide counsel for
17 the witness examined herein with a copy of this
18 examination at no charge.

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1 GRAHAM CHASE ROBINSON-CONFIDENTIAL

2 THE VIDEOGRAPHER: We are now on the
3 record. This begins media file number one in
4 the deposition of Graham Chase Robinson in the
5 matter of Graham Chase Robinson versus Robert
6 De Niro and Canal Productions Incorporated. In
7 the United States District Court Southern
8 District of New York. Case Number
9 1:19-cv-09156 (LJL) (KHP), today is Wednesday
10 February 9, 2022 and the time is 10:04 a.m.
11 This deposition is being taken remotely at the
12 request of Traub, Lieberman, Straus and
13 Shrewsberry, LLP.

14 The videographer is Nate Laningham of
15 Magna Legal Services and the Court Reporter is
16 Brooke Perry. All counsel will be noted on the
17 stenographic record. Will the court reporter
18 please swear in the witness.

19 G R A H A M C H A S E R O B I N S O N, the witness
20 herein, having been first duly sworn by a Notary Public
21 of the State of New York, was examined and testified as
22 follows:

23 EXAMINATION BY

24 MR. DROGIN:

25 Q. State your name for the record, please.

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2 A. Graham Chase Robinson.

3 Q. State your address for the record, please.

4 A. [REDACTED]

5 MR. DROGIN: Okay. And we are
6 operating here under direction of the court
7 that we're limited to five hours and 40 minutes
8 so I would appreciate it if you can keep a
9 running track of how much elapsed time we have
10 on the record, okay? I don't know if that's
11 the video or stenographic --

12 THE REPORTER: Nate can you do that,
13 please?

14 THE VIDEOGRAPHER: Absolutely, yes.

15 MR. DROGIN: Great. And we have -- we
16 have -- I'll just propose it again, Ms. Harwin,
17 that you have a standing objection to the form
18 to every single question that I ask today,
19 correct?

20 MS. HARWIN: That's correct. We so
21 stipulate and Mr. Drogin and Mr. Bennett, if
22 you could also --

23 MR. DROGIN: Excuse me, excuse me. I
24 just asked if you stipulated. You know that we
25 have an issue with time here, so as long as

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2 you're --

3 MS. HARWIN: Yes, I'm just asking to
4 confirm back on the record both of you that
5 that's the party's stipulation.

6 MR. DROGIN: I proposed it and you
7 confirmed it and then you kept speaking, so --

8 MS. HARWIN: Mr. Bennett, can you
9 confirm that as well.

10 MR. BENNETT: Confirmed.

11 MR. DROGIN: Okay. This is a
12 continuation of Ms. Robinson's deposition. I'd
13 like to mark as Exhibit E the court's decision
14 dated January 26, 2022. If we could get that
15 up on the screen. This will be Exhibit E.

16 MS. LAZZARO: It should be in the chat.

17 (Whereupon, the Court's Decision dated
18 1/26/22 was marked as Defendant's Exhibit E,
19 for identification, as of this date.)

20 Q. Ms. Robinson you see the document?

21 A. Yes.

22 Q. Have you ever seen this document before?

23 A. Can I -- how can I scroll? I have like a wheel
24 spinning.

25 MR. DROGIN: Let's go off the record,

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2 please.

3 THE VIDEOGRAPHER: We are off the
4 record. The time is 10:08 a.m.

5 (Whereupon, a discussion was held off the
6 record.)

7 THE VIDEOGRAPHER: We are back on the
8 video record, the time is 10:09 a.m.

9 Q. Ms. Robinson, have you seen this document
10 before?

11 A. I'm looking at it right now.

12 Q. The question is, have you seen it before, not
13 whether you're looking at it right now.

14 A. I wouldn't be able to know unless I actually
15 looked at the document, let me --

16 Q. Okay. Go ahead, look at the document. Have
17 you seen this document before?

18 A. I don't believe I have.

19 Q. Okay. Let's proceed. Ms. Robinson, your
20 father's name is Donald Robinson; is that right?

21 A. Yes.

22 Q. And what is his home address?

23 A. Oh um --

24 MR. DROGIN: Why don't we leave a blank
25 in the transcript and you can fill it out.

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12 REQUEST NOTED

13 Q. You at one point were represented by an
14 attorney named Jeff Pagano, correct?

15 A. Yes.

16 Q. Did you ever meet with him in person?

17 A. No.

18 Q. In connection with his representation of you,
19 did you communicate with him at all by telephone?

20 A. Yes.

21 Q. Approximately how many times?

22 A. I don't know.

23 Q. During any of the telephone calls that you had
24 with him, was anyone else present on the line?

25 A. Not in connection with Canal Productions or my

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2 employment.

3 Q. Well, at the period of time that Mr. Pagano was
4 representing you, during any of the phone calls that you
5 had with him, was anyone else present on the line?

6 A. Not that I can recall, no.

7 Q. Okay. Did you have any video meetings with Mr.
8 Pagano?

9 A. Not that I can recall.

10 Q. Did you have any texts with Mr. Pagano?

11 A. Yes.

12 Q. To the best of your recollection, was anyone
13 else on any of the text messaging, in other words, was
14 it a group text with anyone else?

15 A. No.

16 Q. Did you share any of the texts between you and
17 Mr. Pagano with anyone else?

18 A. No.

19 Q. Did you have e-mail communications with Mr.
20 Pagano?

21 A. Yes.

22 Q. In any of those e-mail communications was
23 anyone else CC'd or BCC'd?

24 A. No.

25 Q. [REDACTED]

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2 A. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

18 Q. And when you were a teenager, a very close
19 friend of yours died; is that correct?

20 A. I -- yes.

21 Q. And who was that friend? I don't need a name,
22 I just need a relation.

23 A. She was somebody that I grew up with.

24 Q. And how did she pass?

25 A. She had cystic fibrosis and died a couple of

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2 days before Christmas from pneumonia, I believe.

3 Q. And would you describe there as being any other
4 traumatic events in your life unrelated to your
5 employment?

6 MR. DROGIN: After we get this answer
7 we'll go to Exhibit F.

8 A. Nothing that I can recall at this moment.

9 MR. DROGIN: Can you please take a look
10 at what we've marked as Exhibit F, which was
11 produced as Robinson pages 16396 and 16397.

12 (Whereupon, a document Bates numbered
13 Robinson 16396 and 16397 were marked as Exhibit
14 F, for identification, as of this date.)

15 Q. Are they in the chat?

16 A. Um, yeah I'm looking at them right now.

17 Q. Okay. Okay, can you take a look on the second
18 page?

19 A. Okay, yeah, I'm just reading.

20 Q. I'm just directing you to the second page. Let
21 me know when you're there.

22 A. Okay.

23 Q. Alright, in the third bullet point, the one
24 that starts "historically", could you just read that
25 third bullet point out loud?

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2 A. Historically she -- is this the right one?

3 Yes. Historically she is an avid runner and in the past
4 has run as many times as 13 miles daily on a regular
5 basis. She had -- has had to take time off to 2 lower
6 back and hip issues. More recently she has been running
7 two miles a day, five days a week. This is very helpful
8 for her anxiety. She also does yoga.

9 Q. The specific sentence there that talks about
10 you running two miles a day, five days a week, is that
11 something that you told your doctor?

12 A. If this is something that she noted.

13 Q. Okay. So if she noted it, then it's something
14 that you told her?

15 A. It's something that she and I discussed, if she
16 noted it.

17 Q. Is it factually accurate?

18 A. I believe it would be if she noted it. I don't
19 --

20 Q. Okay. And the date of this visit, if you look
21 at the very top of the first page, can you just confirm
22 that you had an appointment with her on December 21,
23 2021?

24 A. It seems that that's when I did it because it's
25 listed there.

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2 Q. Okay. So as of December 21, 2021, you had been
3 running two miles a day, five days a week or at least
4 that's what you told your doctor; is that correct?

5 A. Um --

6 Q. Yes or no.

7 A. Yes. Can I clarify?

8 MR. DROGIN: That's okay. Your
9 attorney can clarify. We're going to try to
10 get through this with yes or no question,
11 that's fine.

12 MS. HARWIN: Mr. Drogin, I would note
13 for the record this does not appear to be the
14 document that was Robinson as 16396 through 99
15 this document is not Bates labelled, uh --

16 MR. DROGIN: Okay. So noted. It was
17 part of your document production 12. I can't
18 tell you why this one doesn't have your Bates
19 number on it. That's above my pay grade. But
20 if you think it's a document that's not
21 authentic, I'm sure you'll let us know.

22 Q. Did there come a point in time, Ms. Robinson,
23 where you began to work more frequently from home as
24 opposed to Canal's office?

25 A. Yes.

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2 Q. When was that approximately, if you recall?

3 A. I recall it was about 2015 or '16 when I was
4 doing the albums, work on the albums for Bob.

5 Q. Did you maintain a home office right through
6 the end of your employment?

7 A. Starting in 2017, yes. I had an official
8 office at my home.

9 Q. During the period of time from 2017 until the
10 end of your employment, how frequently would you visit
11 the Canal office as opposed to working what we now call
12 remotely?

13 A. I would say frequently, but I would clarify and
14 say again it depended on what the schedule was. During
15 2018, 2019, I worked a lot at the [REDACTED] townhouse, Bob's
16 townhouse or running errands for the townhouse. There
17 were other times when I -- yeah, I mean there were -- it
18 varied depending on what Bob's schedule was, what the
19 year was, what the work was.

20 Q. Okay. And for some point over the duration of
21 your employment, you worked out of LA; is that correct?

22 A. Yes.

23 Q. And for some part of your employment, you
24 worked out of Spain; is that correct?

25 A. In earlier -- in earlier years there was a

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2 period of time when I went back and forth from Spain to
3 be out of sight out of mind with Grace, and then there
4 was the flexibility after 2015 where I spent -- I took a
5 trip here and there and worked from Spain.

6 Q. So the answer -- so notwithstanding the
7 elaborate answer that you just gave, the actual answer
8 to my question is yes; is that right?

9 A. At times, yes.

10 MR. DROGIN: Okay. I'm trying as hard
11 as I can to make these yes or no questions,
12 which is, as I understand it, the best way to
13 move through this quickly as possible. So I
14 would appreciate, if it's a yes or no question,
15 please answer it. If I don't pursue it, that's
16 my bad and your attorney can question you to
17 try to correct it.

18 Q. When you were working outside of Canal's
19 office, you could set your own hours; isn't that true?

20 A. I would not say that is correct.

21 Q. Alright. And that's because the job could be
22 24/7; is that right?

23 A. That would be one of the reasons, yes.

24 Q. You could however, structure the day how you
25 wanted subject to the responsibilities of that day;

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2 isn't that true?

3 A. I don't believe that's correct.

4 Q. Alright. And can you describe for us what your
5 home office set up was?

6 A. Um, I would -- my home office set up was um --
7 uh, the dining room I would have a printer, I would have
8 all my documents on the dining room table. I would sit
9 at the dining room table. Um, that would be the room
10 that would be -- I would be at the majority of the time,
11 it's where we sort of worked out of.

12 Q. Okay. And what kind of chair did you sit in?

13 A. Um, a regular chair.

14 Q. Alright. Did that put strain on your back?

15 A. No.

16 Q. Did you use a desktop computer or a laptop
17 computer or both or neither?

18 A. Majority was my work laptop, but at times I
19 also had the Canal desktop computer in my home, so I
20 guess, mostly my Canal laptop and other times the
21 desktop.

22 Q. Okay. So you had access essentially to two
23 different computers, correct?

24 A. Specifically my laptop, rarely the Canal
25 desktop. It was only when I was organizing files I

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2 would have that.

3 Q. And did you return that desktop to Canal?

4 A. Yes, I did.

5 Q. Peter Grant is an attorney who represents Bob
6 or represented Bob; is that correct?

7 A. Yes.

8 Q. And you would interact with Mr. Grant; is that
9 right?

10 A. Yes.

11 Q. In connection with your dealings with Mr.
12 Grant, you would negotiate perk deals for Bob, correct?

13 A. I don't know if I would characterize it that
14 way.

15 Q. Okay. Perk budgets, are you familiar with that
16 term?

17 A. Yes.

18 Q. What is a perk budget?

19 A. A perk budget is an allotment of money that Bob
20 would get in order to pay for certain as -- certain
21 things -- certain needs that he um, would have on a film
22 such as crew or private planes, um hotel, I mean there
23 are all different types of um -- different types of perk
24 budgets. Some of them were only private plane travel,
25 some of them were more broad and included below the line

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2 items.

3 Q. What does that mean, below the line items?

4 A. Crew, hotel, just um, his needs.

5 Q. And those things were negotiated, correct?

6 A. Those were negotiated by Peter Grant or Josh
7 Lieberman, Bob's agent. Mostly, I think by Josh
8 Lieberman. I would be a part of the discussion of what
9 Bob's needs were and what would need to be in the perk
10 plan, like how many hotel rooms he would need or which
11 gym equipment or how many private planes he'll need back
12 and forth, things of that nature.

13 Q. So you were familiar with the perk budgets on
14 Mr. De Niro's projects; is that fair?

15 A. At the time that they were created probably,
16 yes. The answer is yes to that. But now I wouldn't
17 recall.

18 Q. Okay. And on occasion the perk budget would
19 include a line item for Mr. De Niro's personal trainer;
20 is that right?

21 A. I wouldn't characterize it that way. There was
22 money allotted for Dan Harvey.

23 Q. Well, who is Dan Harvey?

24 A. Dan Harvey is -- does some work as Bob's
25 personal trainer, but he is an executive assistant.

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2 Q. I see. And the -- when there was a line item
3 for Mr. Harvey in the perk budget, that would be money
4 that Canal could utilize to pay Mr. Harvey; isn't that
5 right?

6 A. It would be money that Bob was reimbursed for
7 Dan Harvey's expense. And to clarify, it was discussed
8 that Dan did more on set than just train Bob. And
9 that's how it was conveyed to the production, is that
10 Dan worked him out, but also had other responsibilities.

11 Q. Okay. Do you have any recollection as to some
12 of the amounts, weekly amounts that were negotiated as
13 part of the perk budget for Mr. Harvey, Dan Harvey?

14 A. Sometimes none at all, production wouldn't pay
15 for it. He would have a hotel room, sometimes a rental
16 car if he requested one. In terms of the amounts that I
17 can recall, I think that -- I was told by Michael Tasch
18 that they wanted 5,000 per week for Dan, but they didn't
19 always get that amount because a lot of productions
20 wouldn't pay for it.

21 Q. You were present for Mr. Harvey's deposition;
22 is that right?

23 A. Yes.

24 Q. Have you read the transcript of his deposition?

25 A. No.

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2 Q. What, if anything, did you learn about Mr.
3 Harvey's duties and responsibilities that you did not
4 know before his deposition?

5 A. Sorry, can you repeat your question.

6 Q. Yeah. What, if anything, did you learn about
7 his duties that you didn't know before the deposition?

8 A. I think that there were a couple of things that
9 I can recall. Some of them were suspicions that I
10 thought that were part of his job duties, but again, one
11 of them was him being on call for Bob while he was on
12 set and on location. I was -- I didn't believe it, and
13 I still don't, but working out with Bob 35 hours a week,
14 I believe is what he had cited because Bob didn't work
15 out that many hours per day, six or seven days a week,
16 that would be five or six hours a day, I think if we
17 break it down. Um --

18 MR. DROGIN: Why don't we do this, why
19 don't we leave it blank in the transcript and
20 if there's anything else that you recall at a
21 later time you can add that.

22 (INSERT:) _____.

23 REQUEST NOTED

24 Q. Now you sort of changed titles in 2017; isn't
25 that right?

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2 A. Bob and I had a discussion about that, yes.

3 Q. Can you open up, please take a look at Exhibit

4 G?

5 A. There are a bunch of other ones that have been
6 put.

7 Q. Yeah, just to stay ahead, I've asked Brittany
8 to upload a bunch at a time, so we --

9 A. Okay. Thank you. So I skip F and I go to G.

10 Q. Well, we've --

11 A. Oh, F was corrected?

12 MS. LAZZARO: Just for clarification, I
13 uploaded the same Exhibit F with the Bate stamp
14 number that's reflected on the document now,
15 but you can go to G.

16 THE WITNESS: Okay. Downloading it.
17 Clicking to open.

18 (Whereupon, a document Bates numbered
19 Robinson 00003284 was marked as Exhibit G, for
20 identification, as of this date.)

21 Q. You have it?

22 A. Yes.

23 Q. So this was a discussion that you actually
24 initiated in August of 2017; is that right?

25 A. This e-mail I initiated in August of 2017. I

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2 don't recall exactly when the discussions on job title
3 started. This is all from a conversation that we had
4 had -- we had.

5 Q. So the bottom e-mail, August 28, 2017, you
6 indicate, "I know we said we'd finalize and discuss
7 'later'. So I thought I'd e-mail you regarding the
8 title change we discussed: VP, Production & Finance".

9 Do you see that?

10 A. Yes.

11 Q. So is it fair to say that in August of 2017,
12 you were looking for a title change?

13 A. It's something that Bob and I discussed, yes.

14 Q. Alright. And then an e-mail above it, you
15 follow-up with him on September 12th to remind him about
16 that; is that true?

17 A. Yes.

18 Q. And then an e-mail above that, you remind him
19 again on November 9th; is that true?

20 A. Yes, it looks to be true.

21 Q. Okay. And then you reminded him again on
22 November 10th, correct?

23 A. Yes, and I believe I continued to remind him
24 until December.

25 MR. DROGIN: Alright. So let's take a

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2 look at Exhibit H.

3 (Whereupon, a document Bates numbered
4 Canal 0045968-69 was marked as Exhibit H, for
5 identification, as of this date.)

6 Q. Okay. So you said that you reminded him until
7 December and you sent an e-mail to him on December 11th
8 recapping a discussion that you had with him; is that
9 correct?

10 A. I wouldn't characterize that it was a -- as a
11 discussion that we had. I think it -- like I don't mean
12 -- let me read it, please.

13 Q. No, that's okay. You disagree with my
14 characterization and that's fine. In your December 11th
15 e-mail you list below the title, you see that, a
16 discussion of what your job encompasses, do you see
17 that? And it goes on, it's four paragraphs long.

18 Do you see that?

19 A. Yeah, I'm reading it. Yes.

20 Q. Was that an accurate description of what your
21 job duties, what your job encompassed in December of
22 2017?

23 A. They were jobs at times that I was asked to do
24 by Bob.

25 Q. Let's go back to my question. Is that an

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2 accurate depiction of what your job encompassed in
3 December of 2017, yes or no?

4 A. Yes, they were some job duties that my job had
5 been.

6 MR. DROGIN: Let's just stop at yes. I
7 don't want to have to go back to the Judge and
8 show how you refused to answer with yes or no.
9 I want to make it very easy.

10 Q. Now it was common to begin discussions with Bob
11 at one point and you would need to remind him and they
12 would eventually get resolved at a later point; isn't
13 that true?

14 A. Can you repeat that question again.

15 Q. Sure. He was not quick to follow-up when you
16 wanted to have conversations with him about, call it
17 meaningful topics; is that fair?

18 A. I don't see that -- I don't think that that
19 would be fair to -- I believe that there were other
20 conversations that we had had that were quicker, but
21 this one -- this one, yes.

22 Q. Alright but in the top e-mail, the one sent by
23 you Sunday, December 24th, do you see that? At the very
24 top of the page.

25 A. Yes, on Christmas Eve.

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2 Q. Okay. You said, "thank you, this means the
3 world to me, hope you are enjoying some down time" and
4 then there's two X's.

5 Do you see that?

6 A. Yes.

7 Q. What are the X's?

8 A. They're a way of signing off.

9 Q. Yeah, isn't that like the universal signal for
10 a hug?

11 MR. DROGIN: Hey cut it out, we're on
12 video here. Cut it out. Dog, man. Go ahead.

13 Q. Isn't that symbol you understand to be a hug?

14 A. No, when I sign off --

15 Q. That's fine. If you don't understand it to be
16 hugs, that's fine.

17 MS. HARWIN: Counsel, please let her
18 finish her answer.

19 Q. I'm asking yes or no questions. Do you
20 understand X's to be the universal sign for hugs?

21 A. I do not use them in that way, no.

22 Q. Not my question. Do you understand X's to be a
23 symbol for hugs?

24 A. No.

25 Q. Okay.

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2 A. Can I clarify that I -- it's an ending of a
3 conversation or like a, you know, that's how I use them.

4 Q. So now is it your testimony that whenever you
5 would end a conversation you would just put two X's?

6 A. Not on every conversation, but I used them to
7 stop the conversation.

8 MR. DROGIN: Got it. Okay. Now in --
9 let's go to Exhibit I, please.

10 (Whereupon, a document Bate stamp
11 numbered Robinson 00002607 was marked as
12 Exhibit I, for identification, as of this
13 date.)

14 Q. Let me know when you've got it.

15 A. I have it. I'm reading it. There's some weird
16 funky symbols on it. Is that how it's supposed to be?

17 Q. Yeah, this is just how we got it from Counsel.
18 I guess that's just the way that it was produced.

19 But do you see there's mention of tabling a
20 conversation since the prior fall?

21 A. Let me read it.

22 Q. I'll help you out here, it's the bold
23 paragraph. Also we've been tabling a conversation since
24 the last fall (how unlike us:).

25 Do you see that?

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2 A. Yes, I'm just trying to read that.

3 Q. Just that paragraph. My question is, what was
4 the conversation that had been tabled since last fall?

5 A. This was sent in 2017.

6 Q. We'll ask it a different way. Do you recall
7 what the conversation was that had been tabled, yes or
8 no?

9 A. I don't recall what the specific conversation
10 was.

11 Q. Okay. Thank you. Now how long have you known
12 that Bob [REDACTED]

13 A. Since my employment began it was well known.

14 Q. And he would [REDACTED]
[REDACTED]; is that right?

16 A. Yes.

17 Q. In that paragraph, you say, no heart attacks,
18 it will be quick. But I have a large bottle of aspirin
19 on hand for you and a nice cold martini for me or is it
20 the other way around?

21 Do you see that?

22 A. Yes.

23 Q. [REDACTED]
[REDACTED]

25 A. It's being -- the way that I had written it, I

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2 believe it was being lighthearted, you know, just making
3 sure that he knows that it wasn't a serious conversation
4 or just something that we could just talk. It's --
5 yeah. But I'm also --

6 Q. So my question is whether that was supposed to
7 be --

8 MS. HARWIN: Counsel, she was in the
9 middle of completing a sentence.

10 MR. DROGIN: The question was, was it
11 supposed to be funny. It's a yes or no
12 question.

13 THE WITNESS: It's supposed to be
14 lighthearted is what I would say.

15 MR. DROGIN: Okay. Take a look please
16 at Exhibit J.

17 (Whereupon, the Complaint was marked as
18 Exhibit J, for identification, as of this
19 date.)

20 Q. I'll represent to you that's the copy of the
21 Complaint that you filed in this lawsuit.

22 A. Yes.

23 Q. Alright. Take a look at Paragraph 19. Let us
24 know when you're there.

25 A. Yes.

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2 Q. Now isn't it true that you told Robin
3 Chambers -- back up.

4 In the spring of 2019, isn't it true that you
5 told Robin Chambers that Bob had not yelled at you for
6 four or five years?

7 A. I don't recall that.

8 MR. DROGIN: Alright. So we're going
9 to play an audio clip which is at Robinson
10 7158, at roughly the seven minute and 51 second
11 mark. And I'd ask if you could listen to it
12 and then I'll come back to my question.

13 MS. HARWIN: Can you please --

14 (Whereupon, the recording was played at
15 this time as follows:

16 MS. ROBINSON: Or in the sense that
17 even when he travels with her -- I swear, the
18 e-mail that I got from Tiffany -- Bob has
19 screamed at me before, I've had it, but not in
20 the last, like, four or five years. You know,
21 I've never -- I've never had him screaming or
22 yelling.)

23 Q. Does that refresh your recollection as to
24 whether or not you told Robin Chambers that Bob had not
25 screamed at you in, like, the last four or five years,

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2 yes or no?

3 A. No. Because I don't know what that was in
4 context with --

5 Q. That's fine. That's fine.

6 A. So it could have been a subject that he had or
7 I can't remember.

8 Q. Okay. I'm just asking yes or no. Now within
9 the last three years of your employment, how frequently
10 did Mr. De Niro call you a bitch?

11 A. On several occasions.

12 Q. Alright, more than 10?

13 A. And this is the last three years, just to
14 clarify?

15 Q. Yes.

16 A. I would say in the range -- like more than
17 five.

18 Q. Alright and --

19 A. Like the three years that I can --

20 Q. Right. And during that same period of time,
21 approximately how many times did he call you a brat?

22 A. Again three years?

23 Q. Yes.

24 A. Multiple times.

25 Q. Who was the female business partner that Mr. De

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2 Niro referred to as a cunt?

3 A. Jane Rosenthal.

4 Q. And didn't you in fact refer to Tiffany Chen as
5 a cunt, yes or no?

6 A. I can't recall a specific time when I referred
7 to her like that.

8 Q. Okay. Didn't you call Tiffany a cunt to Robin
9 Chambers?

10 A. I don't recall that.

11 Q. Didn't you refer to Tiffany Chen as a cunt to
12 your friend Brian Zack?

13 A. I don't recall that.

14 Q. Do you recall ever referring to Tiffany Chen as
15 a bitch to Robin Chambers?

16 A. I don't recall specifically a time where I did.

17 Q. Okay. Now sometimes you would scream at Bob as
18 well; isn't that right? It's just a yes or no question.

19 A. I wouldn't say that is correct. I can recall
20 one time in which I had raised my voice.

21 Q. Alright. Now Paragraph 19, you talk about Mr.
22 De Niro referring to his executive assistants as the
23 girls.

24 Do you see that?

25 A. Yes.

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2 Q. Okay. And that was a reference to whom? Who
3 were the girls?

4 A. The girls were the female executive assistants
5 in the office.

6 Q. Now that's a -- okay that's a reference that
7 Michael Kaplan used to describe them as well, isn't it?

8 A. Yes.

9 Q. And that's a term that Robin Chambers used to
10 describe those women; isn't that right?

11 A. Yes, it was engrained by Bob who had -- who
12 often used that term.

13 Q. So the answer to my question is yes, Robin
14 would use that term as well, correct?

15 A. Yes.

16 Q. And you used that term to refer to the
17 executive assistants in the office, did you not?

18 A. Yes.

19 Q. At one point, one of those females came to you
20 and complained to you that she did not like the fact
21 that they were being referred to as the girls; isn't
22 that true?

23 A. Um, I would clarify that -- yes, I mean yes.
24 There was contention about that.

25 Q. And after that complaint, did you ask Bob not

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2 to use that term?

3 A. I don't recall.

4 Q. Did you make Bob aware that someone had
5 complained to you about this?

6 A. It was at the very tail end of my employment.

7 Q. Okay. So approximately when was this complaint
8 made?

9 A. The range would probably be the last couple of
10 weeks, I believe, you know, I don't know. I don't want
11 to guess, so I don't know.

12 Q. My question though is, did you ever make Bob
13 aware that you had received this complaint, yes or no?

14 A. Not that I can recall.

15 Q. And did you modify your own behavior after that
16 to stop using the term?

17 A. Yes.

18 Q. Take a look at Paragraph 20 where you talk
19 about a joke that was made about Viagra. Do you see
20 that?

21 A. 20.

22 Q. 20, "De Niro, made vulgar, inappropriate and
23 gender comments to Ms. Robinson. He would joke with Ms.
24 Robinson about his Viagra prescription". Do you see
25 that?

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2 A. Yes.

3 Q. That -- about how many times did he joke with
4 you about his Viagra prescription?

5 A. Would joke on multiple occasions, very
6 inappropriately.

7 Q. Inappropriate jokes?

8 A. Yes.

9 Q. When was the last time that happened, what
10 year?

11 A. I believe 2018.

12 Q. In Paragraph 20, he told you to imagine him on
13 the toilet. How many times did that happen?

14 A. That was on one occasion in 2018 at his
15 townhouse.

16 Q. And what did he say? What were his words as
17 you recall them?

18 A. He brought me into the bathroom in his -- the
19 master bathroom in his um -- in his townhouse. And he
20 said, he wanted to show me where he wanted me to put the
21 TV in the bathroom and he said you have to picture me um
22 --

23 Q. Have you completed your answer?

24 A. No, I'm trying to -- I'm just trying to -- just
25 give me a second to recall. He said you have to picture

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2 me on the toilet and he squatted on the toilet, imagine
3 me sitting on the toilet and then he pointed to, like,
4 where he would want the TV to show me that when he was
5 sitting on the toilet, where he would want to be
6 watching the TV. And I felt it was incredibly
7 appropriate and I did say something to him at that point
8 that that was disgusting.

9 Q. Okay. And also on Paragraph 20, there was a
10 comment about manual labor would make a man out of you.
11 Do you see that?

12 A. Yes.

13 Q. But that's actually an expression that you used
14 with some of the female employees in Canal's office;
15 isn't that true?

16 A. I would not say that is true. I don't recall
17 any time that I said, make a man out of you.

18 Q. Okay. How many times did he say that to you?

19 A. It was 2018 he had made a specific comment
20 after I had lifted this very gigantic large flat screen
21 TV box up two flights of stairs with Michael Kaplan and
22 I had spoken to Bob, he had called right after it and
23 Michael Kaplan was standing right there, and I told him
24 that we did it. And he said, haa, haa, haa, that's what
25 makes a man out of you Chase. And I said no, that's not

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2 correct.

3 Q. Okay. And he said haa, haa, haa?

4 A. I mean, he does this, like, haa, haa, haa, haa,
5 sort of --

6 Q. Got it. Also in Paragraph 20 you say to him --
7 sorry, you said that he suggested that you could get
8 pregnant using sperm from her married male coworker. Do
9 you see that?

10 A. Yes.

11 Q. How many times did that happen?

12 A. That was an incident that happened when we were
13 sitting in the drawing room and I was discussing my
14 career and wanting to, you know, focus on that. But
15 also have some personal time and he had said, Chase,
16 women can get pregnant whenever they want. You just
17 need to get some sperm. He paused and then said, you
18 can just get some from -- you know, you can get some
19 free sperm from Michael Kaplan and I was horrified at
20 that.

21 Q. Now as you were just saying that, it sounded
22 like -- I know we have a video of it, so we'll have the
23 audio as well, but did you say it with sort of a
24 chuckle?

25 A. With, like, I would say, a smirk and it was my

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2 face, I was -- it was just the most inappropriate and
3 most disgusting thing that an employer could say or one
4 of the most disgusting and -- it was just incredibly
5 inappropriate.

6 Q. Alright. Now you didn't think he was serious
7 though did you?

8 A. I -- I can't speculate on whether Bob thought
9 it was serious or not, but it was incredibly disgusting
10 and inappropriate.

11 Q. I'm asking you whether you thought he was
12 serious, that this was a serious suggestion he was
13 making?

14 A. I don't know what -- it was horrible to have
15 that hear that from my employer, and incredibly
16 inappropriate.

17 [REDACTED]
18 DA [REDACTED]
19 CT [REDACTED]
20 [REDACTED]

19 A. Yes.

20 Q. And is that something that you shared with
21 people in the office at that --

22 A. I wouldn't say that that is correct. I've
23 shared it with Robin Chambers.

24 Q. Isn't she one of the people in the office?

25 A. Yes, technically, I guess, yes.

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2 [REDACTED]

3 DA [REDACTED]
4 CT [REDACTED]
5 TO [REDACTED]
6 N [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

10 A. No.

11 Q. Let's go to Paragraph 22. How many times did
12 he urinate during telephone calls with you over the
13 course of 11 years.

14 A. Dozens of times. He had absolutely no
15 boundaries.

16 Q. And when was the last time?

17 A. 2018, 2019.

18 Q. Alright. And did you ever tell him that you
19 didn't like that or protest in any way? Yes or no?

20 A. Can you repeat your question.

21 Q. Did you ever ask him to stop doing that or make
22 it known to him that you didn't like that?

23 A. Yes.

24 Q. Did he stop doing it?

25 A. No.

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2 Q. Did you continue to make it known to him that
3 you didn't like it? Just a yes or no question.

4 A. No, I don't believe I did continue after. It
5 was quite awkward to have to discuss or hear it.

6 Q. But just as an example, I mean, could you have
7 said in substance, Bob, I don't like the sound of your
8 peeing, call me back when you're done? You could have
9 said that, right? I mean --withdrawn.

10 A. No, I don't believe I could have.

11 Q. You couldn't have said that, okay.

12 A. I think you have to be very careful on how you
13 approached Bob and what you said because he could be
14 very retaliatory and he could take offense to a lot of
15 --

16 Q. Okay. I'm not asking about retaliation yet.
17 The Paragraph 23, the physical contact based on your
18 gender, you said he would direct you to scratch his
19 back.

20 How many times did he direct you to scratch his
21 back?

22 A. More than a dozen.

23 Q. And obviously that would have been at times
24 when you were physically in the same location?

25 A. Yes.

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2 Q. When was the last time that happened?

3 A. Probably 2017, 2018.

4 Q. Alright. And did you tell him that you didn't
5 like that or you didn't want to do that?

6 A. I think my face and how awkward it was could be
7 seen. I did at one point suggest that he use the back
8 scratcher that Daphna Keitel had given to him for
9 Christmas and he preferred that I scratch his back.

10 Q. Okay. And did you?

11 A. Yes.

12 Q. Alright. And how many times did he ask you to
13 button his shirts?

14 A. I would say dozens of times when he was getting
15 ready for an event or a press -- the Tribeca Film
16 Festival press day, fix his collars, tie his ties,
17 things like that. He would direct me to come into the
18 bathroom in his office. He'd close the door and he
19 would ask me to do these things.

20 Q. And prod him awake when he was in bed, how many
21 times did that happen?

22 A. About five. I would say the range of five to
23 seven times.

24 Q. Okay. Any idea why he asked you to do that?

25 A. The why --

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2 Q. Yes or no, do you have any idea why?

3 A. To wake him up, to go into the bedroom and wake
4 him up. Which again, totally inappropriate.

5 Q. Yes, but do you know why? Do you know why
6 these requests were made?

7 A. To -- I guess to wake him up.

8 Q. Okay. Now do you know whether he ever asked
9 Dan Harvey to do any of the things we've just been
10 talking about; scratch his back, button his shirts, fix
11 his collars, tie his ties or prod him awake when he was
12 in bed? Yes or no question.

13 Do you know whether Dan Harvey was ever asked
14 to do any of those things by him or as well?

15 A. Not that I'm aware of.

16 Q. Let's go to Paragraph 25, we're now talking in
17 the second paragraph, you said, "among these duties, De
18 Niro directed Ms. Robinson to put away his boxers, hang
19 up his clothes, wash his sheets, vacuum his apartment,
20 set his table, mend his clothing and select gifts for
21 his children."

22 Do you see that?

23 A. Yes.

24 Q. With what frequency did these things happen
25 that you're mentioning here?

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2 A. Some of them are more frequent than others.

3 Q. So for example, setting his table, is that a
4 reference to Martin Scorsese's birthday party?

5 A. That was one of the many times that I've had to
6 set a table.

7 Q. Okay. That was a party, right?

8 A. That was one of -- yes, one of many.

9 Q. Okay. But are you suggesting that you were
10 some sort of domestic servant who would come in and set
11 a table for him, like a housekeeper?

12 A. That's what the Martin Scorsese one is. I
13 vacuumed the apartment. I cleaned the apartment. I set
14 up the table, put the napkins, the plates, light the
15 candles. Tiffany and Bob had me straighten up the
16 house. It was just very demeaning and I like -- I can't
17 believe that I was asked to do that. I was VP of
18 production and finance at the time and here I am setting
19 a table and vacuuming his home.

20 Q. Okay. So the vacuuming the apartment, that was
21 a one-time event relating the birthday dinner; is that
22 right?

23 A. No.

24 Q. So how many times did you vacuum the apartment?

25 A. Excludeing vacuuming in the office, his

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2 apartment, I would say more than a dozen times.

3 Q. Was that at [REDACTED] or are we talking about a
4 different apartment?

5 A. I mean there were different apartments where I
6 had vacuumed at, like, that were his, whether they were
7 gym apartments that he had, having to set those up for
8 him or the [REDACTED] apartment which had -- I vacuumed on
9 many occasions.

10 Q. And washed his sheets. You actually washed his
11 sheets at your apartment; is that right?

12 A. I washed his sheets at my apartment, at his
13 apartment. Yeah, I spent hours and hours washing bed
14 sheets, towels. Yes.

15 Q. Okay. Did he ask you to do all those things?

16 A. Yes.

17 Q. Let's go to Paragraph 32.

18 THE WITNESS: Can we take a five-minute
19 break, I have to turn down the heater.

20 MR. DROGIN: Absolutely. Why don't we
21 come back at 11:15, we'll take 10 minutes.

22 THE WITNESS: Do you want to go to
23 Paragraph 30?

24 MR. DROGIN: No, no. If you want a
25 break, we're up to Paragraph 32, let's just go

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2 off the record and we'll come back at 11:15.

3 THE WITNESS: Okay.

4 THE VIDEOGRAPHER: Okay. We're off the
5 video record, the time is 11:06 a.m.

6 (Whereupon, a short break was taken.)

7 THE VIDEOGRAPHER: We're back on the
8 video record, the time is 11:16 a.m.

9 Q. So if I could direct your attention to
10 Paragraph 32 of the Complaint. You said. "On multiple
11 occasions, Ms. Robinson told De Niro that she was being
12 harassed."

13 What did you tell Mr. De Niro you were being
14 harassed about and by whom?

15 A. There were many occasions that I spoke to Bob
16 about being harassed, whether it was by him, by his
17 wife, by his business partner Jane Rosenthal, by um, a
18 house manager Peter Lambert, in terms of -- those are
19 some of the people. In terms of what was discussed with
20 Bob, I had on occasion, spoke to him about how he was
21 harassing me on the apartment work in 2019. He had been
22 berating me about items that needed to be done for the
23 apartment. In addition, there were other times in where
24 I had told him that he was either harassing me or his
25 wife had been targeting and harassing me on um -- on uh

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2 -- on items.

3 Q. So in particular -- with regard to him, with
4 regard to --

5 MS. HARWIN: Counsel can she finish her
6 answer?

7 MR. DROGIN: I'm sorry I thought she
8 had.

9 THE WITNESS: I was going to go and
10 discuss the other ones, but I had spoken to Bob
11 about being harassed and Jane Rosenthal
12 creating a toxic work environment including
13 refusing to allow me entry through a door, her
14 berating me, there were multiple complaints
15 with her. I had spoken on many occasions to
16 Bob about Peter Lambert and the harassment that
17 I received from him and on Grace Hightower-De
18 Niro targeting me. I mean there was a lot of
19 discussions I had with Bob.

20 Q. What was the harassment from Peter Lambert?

21 A. I wasn't the only one to complain about
22 harassment with Peter. The harassment was about
23 personal items for Bob and his family, whether it was
24 the catering that they had or just in general, it was
25 something that Bob and I spoke on many occasions and he

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2 agreed that Peter had been harassing me and Grace had
3 been harassing me and targeting me. It was a very
4 difficult time to -- it was very difficult to work, um,
5 in that environment, the toxic work environment. Um --

6 Q. Have you completed your answer?

7 A. Yes.

8 Q. Alright. And did you ever complain to Bob that
9 Tiffany was harassing you? Hello.

10 A. Yeah, I'm trying to think.

11 MR. DROGIN: So just so that the record
12 should reflect --

13 THE WITNESS: I --

14 MR. DROGIN: Excuse me. The record
15 should reflect how long it's taking Ms.
16 Robinson to answer a yes or no question as to
17 whether or not she ever told Mr. De Niro that
18 Tiffany Chen was harassing her. Go ahead.

19 MS. HARWIN: Ms. Robinson was beginning
20 to answer as you interrupted her.

21 MR. DROGIN: I guess not.

22 THE WITNESS: I believe --

23 MR. DROGIN: Should we go off the
24 record maybe?

25 MS. HARWIN: She's answering it.

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2 THE WITNESS: I'm trying to answer and
3 I keep getting interrupted. Um, I was advised
4 by Mr. --

5 Q. Yes or no, did you tell Mr. De Niro that
6 Tiffany was harassing you? Yes? No? Which one?

7 A. I believe that she and he were incorporated
8 into the discussion that I had on him harassing me --
9 them harassing me about apartment items in the [REDACTED]
10 apartment. Um, I had to be very careful though on how I
11 phrased everything, but if this is a yes or no answer, I
12 mean that's my answer.

13 Q. Great. Okay thank you. Now Jane's harassment
14 of you, what did you attribute that to?

15 A. Um, I would say in the beginning part of it was
16 um, Bob and Jane's own issues with each other and at the
17 time -- at the beginning of her harassment, Bob was
18 thinking about ending his partnership with Jane
19 Rosenthal and it was very toxic between the two of them.
20 Um, she had helped me in a way pass along through Megan
21 Livers (phonetic) my resumé. And she once told me that
22 I owed loyalty to her because she helped me get the job.
23 And Bob and Jane were just constantly fighting and in a
24 very difficult or challenging partnership between the
25 two of them. I mean they were not getting along at all,

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2 so I feel that --

3 Q. How did she harass you?

4 A. She berated me at times for things that I
5 didn't do. She made comments -- backhanded comments in
6 front of people. Again, as I had spoken to Bob about
7 all of those incidents and some of them were witnessed
8 by other Canal employees, she had stood in the doorway
9 refusing to let me enter the 8th floor. There were a
10 lot of different ones, but that's what I can recall at
11 this moment. I did speak to Bob about every single one
12 of them, I believe. It wasn't something that I thought
13 was appropriate, should be done. I complained that she
14 created a completely hostile work environment.

15 Q. By the way, what is a hostile work environment?
16 Can you define that term?

17 A. A hostile work environment?

18 Q. Yeah.

19 A. An environment where it's very difficult to do
20 one's job, where you're being targeted, where you're
21 being harassed. I mean it's a very, very difficult
22 environment.

23 Q. Anything else? Can you expand on that or is
24 that -- is that what you understand it to be?

25 MS. HARWIN: Are you asking in a legal

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2 sense? Can you clarify what this question is
3 about.

4 MR. DROGIN: Yeah, the witness keeps
5 using the term, I want to prove that she
6 doesn't actually understand what it means. So
7 I'm asking her to tell me what she understands
8 it to mean, so I can then show that she really
9 doesn't understand what the term means, which
10 is why her entire harassment case unravels
11 because she's using a buzz word that she
12 doesn't really know what the legal term means.
13 Is that clear enough for you?

14 MS. HARWIN: The question remains
15 unclear.

16 MR. DROGIN: Let me ask it another way,
17 Chase.

18 Q. For a work environment to be hostile, do you
19 believe that there has to be an unlawful basis for the
20 harassment?

21 A. I'm not an attorney, so I wouldn't know how to
22 answer that. If you're asking me not in the sense of,
23 like, being an attorney, I believe that, you know,
24 whether it's a toxic work environment or a hostile work
25 environment, it's an environment where you are being

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2 targeted, where you are being harassed, where it's
3 difficult to do your job or you're stopped from doing
4 your job, it is an environment that no employee -- you
5 know, employees can't function in. It is a very
6 difficult environment. I -- I don't --

7 Q. Do you understand a toxic work environment to
8 be the same as a hostile work environment or something
9 else? Because you've used both terms.

10 A. I mean a toxic work environment is, I believe,
11 similar to a hostile work environment.

12 Q. How do they differ?

13 MS. HARWIN: Again Counsel, can you
14 clarify in what context you're asking this
15 question.

16 MR. DROGIN: The witness is using
17 terms, so I don't understand how she's using
18 the terms. I'm asking her to clarify what
19 these terms mean to her since she's using them.

20 MS. HARWIN: Do you mean in relation to
21 the discussion of Jane Rosenthal?

22 MR. DROGIN: I haven't limited it.
23 I've just asked what she understands the term
24 to mean.

25 A. Well, if I go back to what I had been

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2 discussing about Jane Rosenthal creating --

3 Q. Excuse me, I'm not going back to Jane

4 Rosenthal. I'm simply asking you about your

5 understanding of the term toxic work environment and

6 hostile work environment. I asked you if they were the

7 same, you said they are similar, so I'm asking you how

8 they differ.

9 A. One has the word toxic and the other has the

10 word hostile. Toxic work environment, I would say it's

11 a very toxic place to work. I think that it can be

12 contributed to an employer, to you know -- again, a very

13 uncomfortable place for an employee to work. You know

14 what I mean? I -- we're switching between hostile and

15 toxic at this point, hostile, you know, I go to that

16 you're being targeted and harassed. That um, it is a

17 very uncomfortable, a very difficult work place, um, I

18 would -- you know, yeah.

19 Q. Okay. Does it matter why you're targeted, for

20 there to be a hostile work environment?

21 MS. HARWIN: Counsel, again, can you

22 clarify what this question is. Are you asking

23 about under the law?

24 MR. DROGIN: I'm just asking for her

25 understanding.

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2 MS. HARWIN: But the question is
3 totally devoid of context.

4 Q. Well, Ms. Robinson, you disseminated an
5 antiharassment policy to Canal employees, didn't you?

6 A. I facilitated paperwork which your -- Tarter
7 Krinsky and Drogin had given me to have employees sign.
8 I not only passed it along to Tom Harvey to approve, but
9 I also went over it with Bob about --

10 Q. Okay. It's a yes or no question. You
11 disseminated that policy, didn't you?

12 A. I wouldn't characterize it that way. I would
13 characterize it as facilitating the paperwork that
14 Tarter Krinsky and Drogin gave me to have the employees
15 sign.

16 Q. Okay. And you read it?

17 A. Yes, I read it. I read it with Bob.

18 Q. And you signed it?

19 A. I can't recall signing.

20 Q. If there was a complaint about violation of
21 that policy, Canal employees were supposed to bring it
22 to you, correct?

23 A. That is what you, Laurent Drogin and Tom Harvey
24 set up, yes.

25 Q. Did you make any complaints to Tom Harvey about

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2 harassment?

3 A. Yes, it was widely -- yes.

4 Q. Okay. What was the complaint that you made to
5 Tom?

6 A. One that I can recall is in a text message that
7 it was downright harassment regarding the Bob and
8 Tiffany harassing me about the apartment items and
9 things that needed to be done in the apartment. There
10 were other discussions with him about Bob and Tiffany's
11 behavior and the phone calls that I was receiving. It
12 was widely known with -- with people such as Tom Harvey,
13 Michael Tasch, Robin Chambers and Michael Kaplan.

14 Q. Other than with regard to Tiffany, did you ever
15 complain to Tom Harvey about other harassment?

16 A. Can I clarify, it's harassment with Bob or --

17 Q. Well --

18 A. In the decade plus of me working there? I'm
19 just trying to clarify so --

20 Q. You've given examples of harassment that you
21 raised with Tom concerning Tiffany and Tiffany and Bob,
22 that interaction. So I'm asking whether there were any
23 other types of harassment that you've complained about,
24 let's say with other people outside of the Tiffany
25 context?

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2 A. In terms of -- the questions I think are a
3 little -- I'm trying to understand. You're asking about
4 conversations of harassment outside of Tiffany with
5 other people other Tom.

6 Q. No. Take Tiffany and put her aside. Did you
7 ever complain to Tom in sum and substance, hey, Tom, I'm
8 being harassed by blank?

9 A. Yes.

10 Q. Okay. To whom did you complain about? Sorry.
11 To Tom, who did you complain about?

12 A. Grace Hightower-De Niro, Peter Lambert, Bob.
13 Over a decade plus there were many conversations.

14 MR. DROGIN: Okay. Let's go now to
15 Exhibit K, please.

16 (Whereupon, a document Bate Stamped
17 Robinson 00002608 was marked as Exhibit K, for
18 identification, as of this date.)

19 Q. Do you have it?

20 A. Yes.

21 Q. So this is an e-mail you sent to Bob on July
22 18, 2017; is that right?

23 A. Yes. It appears to be.

24 Q. Alright and then the second to last paragraph
25 you wrote, "you know how much I love my job and adore

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2 you." Do you see that?

3 A. Yes.

4 Q. Was that an honest and accurate expression of
5 how you were feeling at that time? Just a yes or no
6 question.

7 A. I'm reading the e-mail so I can --

8 Q. Well, not really asking about the rest of the
9 e-mail. Just asking, when you wrote, "you know how much
10 I love my job and adore you", was that a genuine
11 expression as to how you were feeling at the time, yes
12 or no?

13 A. In that moment, yes.

14 Q. Now after you resigned, do you recall telling
15 Tom Harvey over the telephone "I hope that Bob knows how
16 much I love working for him and how much I adore him".
17 Do you recall saying that to Tom?

18 A. I don't recall. We had many conversations.

19 MR. DROGIN: This is going to be
20 document 7195, and it's approximately six
21 minutes and 10 seconds into the recording.
22 Please listen to it.

23 MS. HARWIN: Can you label it --

24 (Whereupon, the recording was played at
25 this time as follows:

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2 MS. ROBINSON: And I hope that Bob
3 knows that, you know -- how much I love working
4 for him and how much I adore him. I mean I
5 don't know --)

6 Q. Was that a true statement that you -- was that
7 a true statement when you made it?

8 A. I would need to know more about, like, the date
9 and the context. I would probably say that it was in
10 consideration of trying to balance not being retaliated
11 against and trying to keep things calm when I was
12 exiting.

13 Q. Alright. So the answer to my question is no,
14 it wasn't a true statement or yes, it was a true
15 statement or you can't answer it?

16 MS. HARWIN: Can you repeat the full
17 question that's pending.

18 (Whereupon, the record was read by the
19 reporter.)

20 Q. Are you able to answer the question?

21 A. With context I would say --

22 Q. Let me rephrase the question. You heard your
23 own voice, correct?

24 A. Yes.

25 Q. Those are the words that you said, correct?

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2 A. Yes.

3 MR. DROGIN: Alright. Can we go to
4 Exhibit L, please.

5 (Whereupon, a document Bate Stamped
6 Canal 23017-20 was marked as Exhibit L, for
7 identification, as of this date.)

8 MS. HARWIN: Counsel, moving forward,
9 if you're using recordings, please insert them
10 into the chat so that we actually have the
11 recording as an exhibit. Right now the
12 recordings that are being used, they're not
13 being provided and they're not being identified
14 and labeled as exhibits. Everything that's
15 being used in a deposition needs to be labeled
16 as an exhibit.

17 MR. DROGIN: Okay. We'll do that
18 afterwards.

19 MS. HARWIN: Thank you.

20 MR. DROGIN: Noting of course that we
21 got them from you, but okay.

22 Q. Who is -- we have Exhibit L. Who is Raphael De
23 Niro?

24 MS. HARWIN: Hold on, let me download
25 it.

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2 A. Bob's son.

3 Q. And in February 2019, Bob was looking for a
4 summer rental in the Hamptons; isn't that right?

5 A. Uh, yes.

6 Q. Now in Exhibit L on the second page you wrote
7 an e-mail at 9:46 p.m. Do you see that?

8 A. On the second page?

9 Q. I'm sorry, on the first page, you wrote an
10 e-mail at 9:46 p.m. and you say, "Sabrina and Gillian
11 are your father's assistants." Do you see that?

12 A. Yes.

13 Q. Was that true?

14 A. Yes.

15 Q. You say, "while I am happy to be CC'd too,
16 they're the ones that handle your father's schedule,
17 travel, flights, hotel, needs, etcetera."

18 Is that true, yes or no?

19 A. Yes. Some of that stuff, yes.

20 Q. Then you say, "as for my role, I'm not sure
21 where the hostility comes from, but I am not your
22 father's assistant."

23 Was that true, yes or no?

24 A. Yes, it was realigning my job, again, with what
25 Bob and I had discussed and I was constantly being put

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2 back in by Bob in the role of being his assistant --

3 Q. Okay. And I will come back to that.

4 A. I'm trying to clarify.

5 Q. I'm not asking you to. I'm just asking you
6 whether the words you wrote were true, yes or no?

7 A. Yes.

8 MS. HARWIN: Counsel, please do not
9 interrupt her in the middle of a sentence to
10 have a clear record for the court reporter. If
11 counsel wants to interject, please do so after
12 a sentence is complete. There's a lot of
13 talking over one another.

14 MR. DROGIN: I'm trying very hard to
15 make it yes or no, so if I'm talking over, it's
16 because we're getting beyond yes or no.

17 Q. You then wrote I have long moved on to --

18 A. Can I finish that -- the answer to the first
19 question.

20 Q. I'll withdraw the question and I'll ask it
21 again. You wrote, "as for my role, I'm not sure where
22 the hostility comes from, but I am not your father's
23 assistant."

24 Was that true?

25 A. It needs context, but yes.

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2 Q. Alright. You then wrote, "I have long moved on
3 to film production, financial matters and oversight and
4 a host of other things."

5 Was that true?

6 A. With context, yes.

7 (Whereupon, a document Bate Stamped
8 Robinson 00002141-42 was marked as Exhibit M,
9 for identification, as of this date.)

10 Q. Okay. Let's take a look at Exhibit M. I
11 believe this is a resumé that you prepared in 2015. Can
12 you confirm that?

13 A. I wouldn't be able to confirm when or what
14 version or draft of a resumé this was.

15 Q. Alright. So we know, however, it says that
16 your title was "director of production, film 2011 to
17 present."

18 Do you see that?

19 A. Yes.

20 Q. So we know it's after 2011, correct?

21 A. Yes.

22 Q. And we know it's before your title changed to
23 VP of production and finance because that entitle
24 doesn't appear anywhere, correct?

25 A. It appears that that is correct.

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2 Q. Now do the bullet points in your resumé
3 accurately reflect some of the tasks that you were doing
4 in the capacity listed?

5 MS. HARWIN: Counsel, can you clarify
6 what point in time you're asking about.

7 MR. DROGIN: Sure, in 2011.

8 A. And this is -- you're asking if it was true
9 from 2011 to present?

10 Q. Well, not present. I'm going to ask you 2011
11 because that's the starting date. I'm hoping you were
12 going to tell me it was true in 2011.

13 A. My responsibilities under director of
14 production at times grew with the job. I became
15 director of production of film in 2011 and my job's -- I
16 increased during that time.

17 Q. Were these bullet points a fair depiction of
18 your duties and responsibilities during the period of
19 time that you were the director of production?

20 A. They were some of them.

21 Q. Okay. And the bullet points under office
22 manager, are some of those -- do those reflect
23 accurately some of the duties and responsibilities of
24 your role of office manager?

25 MS. HARWIN: You mean in 2010?

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2 MR. DROGIN: In 2010.

3 A. They were some of the job duties I did, but it
4 wasn't consistent.

5 Q. Okay. And what about with regard to your role
6 as executive assistant 2008 to 2010, were those some of
7 the things that you did?

8 A. Those were small amounts of things that I had
9 done between 2008 and 2010.

10 Q. Okay. Take a look at Exhibit N.

11 A. N?

12 Q. N, the next one.

13 (Whereupon, a document Bate Stamped
14 Robinson 00004642 was marked as Exhibit N, for
15 identification, as of this date.)

16 Q. Do you see it?

17 A. Yes.

18 Q. That's an e-mail you sent to your mother on
19 February 24, 2019, correct?

20 A. Yes.

21 Q. And that was a resumé that was current at the
22 time?

23 A. It was a draft.

24 Q. Alright. In the section titled VP production
25 and finance, there are six bullet points. Do you see

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2 them?

3 A. Yes, let me read them. Yes.

4 Q. Did that accurately depict some of your duties
5 and responsibilities as VP of production and finance?

6 MS. HARWIN: At what time?

7 Q. At the time you sent it to your mother.

8 A. It was some of the job duties that I was given,
9 but it wasn't a continuous or regular portion of my job.

10 Um --

11 Q. What did you -- sorry, go ahead.

12 A. It was something that -- again I bring up that
13 Bob and I had discussed what my job --

14 Q. No, I know that. I get that. Please don't go
15 astray. I'm just asking if these were accurate
16 representations of some of your duties and
17 responsibilities as VP of production and finance, yes or
18 no?

19 A. With the context of that it wasn't -- my,
20 like -- it wasn't something that was regularly done and
21 these were jobs that were given to me at times during
22 that period, yes.

23 Q. And the last bullet point it says, "labor
24 regulations oversight." What does that mean?

25 A. It means facilitating the paperwork that I

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2 discussed with both you, Laurent Drogin and Hagit Feder,
3 Tom Harvey. I would facilitate and make sure that all
4 the paperwork was signed and was sent to the correct
5 people that needed the copies of it. I went over the
6 paperwork that you, Laurent had sent to me with Bob and
7 with Tom. I helped facilitate when Bob was in violation
8 of overtime and not having it for our paperwork in the
9 office.

10 Q. Did you interview Sabrina for her position?

11 A. Yeah.

12 Q. Did you interview Lulu White for her position?

13 A. Yes.

14 Q. Did you interview Gillian Spear for her
15 position?

16 A. Yes.

17 Q. Did you extend offers of employment to any of
18 them?

19 A. I facilitated the paperwork that I was given by
20 your firm to them. But I believe the person listed on
21 that was Bob.

22 Q. Okay. But in terms of personally extending the
23 offer to join the firm, did you do that with Sabrina?

24 A. I facilitated and passed the paperwork that I
25 was given.

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2 Q. Okay. But was there ever a phone call with
3 Sabrina saying in sum and substance, we'd like to offer
4 you a position?

5 A. A phone call I'm not aware of. Yeah, in some
6 way, e-mail, meeting, phone, she was offered the
7 position based on Bob's, you know, approval.

8 Q. And did you make the recommendations to Bob
9 that those individuals be hired?

10 A. Michael Kaplan and I discussed the candidates
11 with Bob, ultimately it was Bob's decision. Bob had--

12 Q. So you and Michael --

13 A. --had actually been in [REDACTED], so --

14 Q. Hold on, stop. Let's not go down that road.
15 You and Michael made recommendations to Bob about the
16 hiring of those three employees, correct?

17 A. We, we --

18 Q. Yes or no.

19 A. With context, yes.

20 Q. Do you remember approximately when Lulu White
21 was hired?

22 A. August, I believe, of 2018.

23 Q. Lulu was hired as your assistant, wasn't she?

24 A. That was -- she was hired to be my assistant
25 and the assistant to the office, that was the position.

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2 But that's not what ended up happening with her
3 position.

4 Q. So she was hired as your assistant, yes or no?

5 A. And the office assistant as well.

6 Q. She had a Canal Productions e-mail address; is
7 that right?

8 A. Yes.

9 Q. And her signature line included the phrase
10 "office of Chase Robinson" did it not?

11 A. I can't recall the specifics of what was
12 written on the bottom of her e-mail. I believe there
13 was something along the lines of that.

14 Q. Are you familiar with something called the
15 "office of Chase Robinson"?

16 A. With it -- with the -- I mean, I don't know --
17 I can't recall off the top of my head what was written
18 at the bottom of her e-mail.

19 Q. At the time that you resigned in April of 2019,
20 you had been searching and interviewing for a full-time
21 bookkeeper; isn't that right?

22 A. No, I wouldn't say that that is correct.

23 MR. DROGIN: Okay. We're going to play
24 recording 7199 at approximately 10 minutes and
25 8 seconds.

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2 (Whereupon, the recording was played at
3 this time as follows:

4 MS. ROBINSON: I'll discuss it, it's
5 like all where we were, it's like you know
6 under financial, I put bookkeeper for search
7 because I've been interviewing and searching
8 for that full-time bookkeeper --)

9 Q. Does that refresh your -- first of all, were
10 those your words?

11 MS. HARWIN: Counsel, I had trouble
12 hearing the recording. Can you replay it
13 louder.

14 MR. DROGIN: Yeah, she said she was
15 searching and interviewing for a full-time
16 bookkeeper, but we'll play it again.

17 (Whereupon, the recording was played at
18 this time as follows:

19 MS. ROBINSON: It's like all where we
20 were. It's like, you know, under financial I
21 put bookkeeper search because I was
22 interviewing and searching for that full-time
23 bookkeeper so it didn't fall through the
24 cracks. It was like --)

25 A. I don't believe that that is accurate. Not my

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2 words, what I'm saying is the context of the question I
3 believe is something that I said I was doing not at the
4 moment of 2019 resigning. There was a period of time
5 where I had spoken to Bob and he had asked me to look
6 for a possible bookkeeper and that was, I believe, 2017
7 or '18. So I think that when you're saying that the
8 audio recording is saying that I was presently looking
9 for a bookkeeper, I think that from what I hear of the
10 conversation as I was or I had been, it's not that I was
11 at that time. But I had been and was in 2018 or -- you
12 know. So I think that it's not within -- I don't think
13 that your question is the right -- has the right context
14 to what the recording refers to. And I also would need
15 to listen to a little bit more of the recording to
16 understand when -- when or you know, what else was said
17 in the conversation for that small piece that you gave
18 me.

19 Q. So at one point in time you were searching and
20 interviewing for a full-time bookkeeper; is that
21 correct?

22 A. I don't know that I would characterize it that
23 way. There was a bookkeeper but I don't know if it was
24 full-time or it was something that Bob had discussed.

25 Q. What was Vantage Point?

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2 A. Vantage Point was a benefits company that was
3 brought up during a period of when myself, Michael
4 Kaplan and Michael Tasch were looking into medical
5 benefits and how if Canal switched from being on
6 Tribeca's medical, could, you know, have its own broker
7 and stuff. It was -- it -- it was the company that was
8 brought up, to you know, by the company to -- by the --
9 by Peter Jones the insurance broker as a possibility to
10 help with --

11 Q. I just want the record to be clear, my question
12 was simply what was Vantage Point?

13 A. It was a benefit's company.

14 Q. That's how I would really like you to answer
15 these questions so we don't have to show this transcript
16 to the Court. We've got a lot to get through with a
17 limited amount of time.

18 Now Vantage Point was something you were
19 working on in February of 2019; isn't that true?

20 A. Working on, I wouldn't characterize it that
21 way.

22 MR. DROGIN: Alright, let's take a look
23 at Exhibit O.

24 MS. HARWIN: And counsel, if we can
25 find time for a lunch break soon, we'd

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2 appreciate it.

3 MR. DROGIN: Okay.

4 (Whereupon, a document Bate Stamped
5 Robinson 00001522-23 was marked as Exhibit O,
6 for identification, as of this date.)

7 Q. So Exhibit O is a series of e-mails that you've
8 produced in the course of discovery. This is a
9 three-page document and the first page shows an e-mail
10 at the bottom or actually second from the bottom from
11 David Earls to you at your [REDACTED]
12 dated February 14, 2019. Do you see that?

13 A. Yes.

14 Q. Okay. And then in April -- on April 2nd, at
15 7:59 a.m., you sent it to Bob saying hi, let me know
16 when you have time to meet and go over. Wanted to get
17 started on VPB and gathering information.

18 Do you see that?

19 A. Yes.

20 Q. So these Vantage Point benefits this was
21 something you had been working on from February up until
22 April; is that right?

23 A. I wouldn't characterize it that way.

24 Q. Okay.

25 A. Working on -- yeah, I wouldn't characterize it

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2 that way.

3 Q. Okay. Now you had employee files kept on your
4 home office; isn't that right?

5 A. There were some, yes.

6 Q. Alright. You had Lulu's original timesheets in
7 your home office, correct?

8 A. I wouldn't characterize it that way or say that
9 is correct.

10 Q. Okay. Well, with regard to timesheets, what
11 was it that you returned to Canal?

12 A. I had the timesheets that I had printed out and
13 checked off that the information was correct in sending
14 the overtime to Michael Tasch as requested. So the
15 original timesheets that employees sent to me were on my
16 e-mail.

17 Q. Alright. And this was for Lulu, Gillian and
18 Sabrina; is that right?

19 A. Those were some of the ones that I had, yes.

20 Q. Why were they kept in your home office?

21 A. Well, my office was my official office as
22 decided and agreed to with Bob in 2017. So I had that
23 -- this was my office. I didn't have an office at Canal
24 nor did I have filing cabinets. Um --

25 Q. So you would work on this at home, correct?

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2 A. In the office or at home, it varied.

3 Q. And you would -- I want to make sure I
4 understood it. You would flag it for overtime and then
5 send that to Michael Tasch?

6 A. I was asked by Michael Tasch to send him what
7 the overtime was so that he could pay it by, like, on
8 Monday or Tuesday I could send it to him so it would go
9 into the paycheck of that week. So I would double check
10 that it was correct and send him the amount --

11 Q. Okay. I'm not asking about that. Okay. You
12 also had NDA's, nondisclosure agreements in your home
13 office; is that right?

14 A. Yes, I was asked by Tom Harvey to keep them.

15 MR. DROGIN: Okay. Let's go to Exhibit
16 P, please.

17 MS. HARWIN: That's not appearing in
18 the chat.

19 MS. LAZZARO: Bear with me. It should
20 be uploaded now.

21 (Whereupon, a document Bate Stamped
22 Robinson 00005160 was marked as Exhibit P, for
23 identification, as of this date.)

24 Q. You see Exhibit P?

25 A. Yes.

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2 Q. This is a document entitled personal statement.

3 Is this a draft or something that you were going to send

4 as part of your application to the London School of

5 Economics?

6 MR. DROGIN: Would you like to go off

7 the record and take some more time?

8 THE WITNESS: No, I'm finished reading

9 it now.

10 Q. I'm just asking you what it is. And to make it

11 simpler, can you identify this?

12 A. That's why I'm reading it. Can I read it or --

13 Q. Well, I really just have one question. Maybe

14 we'll just do it that way. One, two, in the fourth

15 paragraph you say, "in managing the RDM team, whether it

16 was his employees, film crew or contracted workers, his

17 hands-off approach gave me the chance to be hands-on."

18 And I want to know what employees you were

19 managing?

20 A. At times the female executive assistants, this

21 wasn't a regular part of what I did, but --

22 Q. I just want to know who they were. I just

23 wanted to know and you told me who they were.

24 A. Okay.

25 Q. Now you would set the annual holidays for Canal

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2 and send them to Bob for approval; isn't that right?

3 A. I wouldn't characterize it that way.

4 Q. Well, you would send Bob a document that said,
5 in substance, these are the days that we're going to be
6 closed for holidays this year; isn't that right?

7 A. I don't think that's correct. Can I clarify or
8 --

9 Q. Not necessary. Did someone determine what
10 holidays the office would be closed each year?

11 A. The federal government. There was a list of
12 the federal holidays and Bob would be reminded that it
13 was Labor Day or you know, whatever federal holiday so
14 he would be e-mailed to be reminded that, you know,
15 Memorial Day was coming up.

16 Q. Did Amelia Brain perform any services for Canal
17 in 2018?

18 A. Yes.

19 Q. When did you first discuss with Amelia Brain
20 the concept of her returning to work for Canal?

21 A. After she left, there were multiple occasions
22 even when she came back and worked -- or helped out
23 Canal on various different ways, whether it was where
24 she lived in LA or in New York. So I don't know when --
25 it was just after she left.

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2 Q. In 2018, did you discuss it with her in March
3 when you were out in Los Angeles?

4 A. I can't recall.

5 Q. Alright. Olivia Janpol; J-A-N-P-O-L, that's a
6 former Canal employee; is that right?

7 A. Yes.

8 Q. Alright. Let me go back, I skipped an exhibit.
9 I want to go back to Exhibit Q. We'll go through this
10 real quick. Actually, you know what, I'm not sure this
11 is the right exhibit. Let's just go to R. Let's just
12 pull up R, we'll catch up and then we'll take our break.

13 (Whereupon, a document Bate Stamped
14 Canal 2793-99 was marked as Exhibit Q, for
15 identification, as of this date.)

16 (Whereupon, a document Bate Stamped
17 Canal 36322-23 was marked as Exhibit R, for
18 identification, as of this date.)

19 Q. Do you have R?

20 A. Yes.

21 Q. Alright. So this is an e-mail from you to Bob
22 May 19, 2016 and you're sending him some information
23 about office closures and holidays; is that correct?

24 A. Can you repeat your question.

25 Q. Yeah, this e-mail shows you sending Bob

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2 information about office closures --

3 A. About a discussion of office closures of when
4 people were taking off, Memorial Day, obviously federal
5 holidays.

6 Q. Yes.

7 A. We followed the Tribeca -- Tribeca Enterprise
8 or Tribeca Film Center sheet that they send.

9 Q. So you were just sending this as a reminder to
10 Bob; is that right?

11 A. Reminder -- it's a discussion. Like, you know,
12 everything was a discussion based on Bob's schedule. So
13 any time off, whether it was holiday, Thanksgiving,
14 summer --

15 MR. DROGIN: That's -- that's fine.

16 Let's take a look at S, Exhibit S.

17 (Whereupon, a document Bate Stamped
18 Canal 44293-94 was marked as Exhibit S, for
19 identification, as of this date.)

20 Q. If I can direct you to the -- it's a two-page
21 document. Let's start on the last page. And you sent
22 an e-mail to Olivia and third line down you said, "next
23 time you want to take vacation, you e-mail me the days
24 and I will decide if it is the right time. It is not
25 for you just to take off when you want."

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2 Do you see that?

3 A. I've lost -- where is this?

4 Q. Second page, there's a short e-mail there sent
5 to Olivia, signed by Chase, without two little X's. But
6 it says, "next time you want to take vacation, you
7 e-mail me the days and I will decide if it is the right
8 time. It is not for you just to take off when you
9 want."

10 Do you see that?

11 A. I don't know if that was the inflection or tone
12 of my e-mail what you had just said, but yes, I see
13 that.

14 Q. Okay. So Olivia would have to clear her
15 vacation days with you first, correct?

16 A. Well, would have to be -- at this time in 2012,
17 it would have to be worked out so that -- because Olivia
18 was Bob's executive assistant, that the work would need
19 to be continued while she was away, so therefore, she
20 had to work it out with -- with, you know, myself or
21 Michael or Amelia at the time --

22 Q. Please, please Ms. Robinson, I really don't
23 want to have to go back to the Court. You told her that
24 she needed to e-mail you the days and you will decide if
25 she could, is that right? That's what it says.

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2 A. With context it was implied that --

3 Q. Yes or no?

4 A. Without the context -- it needs context for me
5 to say yes.

6 Q. Okay. That's fine. Now in the next e-mail on
7 November 30th, you write, "going on into the future,
8 when anyone takes days off, they e-mail me their request
9 three weeks in advance and I'll decide."

10 Do you see that?

11 A. Yes, it's a compliant and a discussion --

12 Q. I'll take a yes. The question was only whether
13 you saw it.

14 A. Yes.

15 Q. Did you write it?

16 A. Yes. But I would also just note that --

17 Q. I haven't asked. I just asked if you wrote it.

18 A. I was just going to say that the e-mail itself
19 is corrupt in some way, just to point that out.

20 Q. Okay. Well, I guess we'll just have to deal
21 with that. In the next e-mail you wrote, "you will
22 e-mail me at least three weeks prior to the day
23 requesting off. I will let you know if it is possible.
24 It is not something you discuss with Bob, you discuss it
25 with me."

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2 Do you see those words?

3 A. Yes.

4 Q. And then November 5, 2014, you've now jumped
5 almost two years, it's an e-mail from you to Olivia and
6 then it says, "and in addition you don't dictate to your
7 job when you take time off, you request it as it is done
8 in every job. You need to e-mail me, not mention it to
9 me or Bob."

10 Do you see that?

11 A. I do, but I note that Olivia did not work at
12 Canal in 2014. The e-mail itself is corrupt.

13 Q. Okay. I guess we'll just have to look into
14 that.

15 A. My e-mail is corrupt at that time.

16 Q. Alright.

17 MS. HARWIN: And Counsel, just a
18 reminder, if we can take a lunch break at some
19 point.

20 MR. DROGIN: Yeah, I'm going to do that
21 very shortly. We're going to go until 12:15.

22 Q. Were you Canal's IT system administrator?

23 A. There were several IT administrators.

24 Q. Were you one of them?

25 A. I wouldn't consider me one of them.

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2 Q. Did you have access to Canal employee's
3 passwords?

4 A. I would clarify that when we switched, Michael
5 Kaplan was the main administrator and then I had a login
6 too with administrator capabilities for e-mails when we
7 switched over from one company to another.

8 Q. Alright. So you could access other employee's
9 e-mails, correct?

10 A. Yes.

11 Q. Sorry?

12 A. Yes. Technically yes.

13 Q. Alright. Did you ever review e-mails sent to
14 or from Bob on which you were not copied?

15 A. To or from Bob?

16 Q. Yes.

17 A. Not that I can recall.

18 Q. What about after you resigned?

19 A. After I resigned? No.

20 Q. Did you ever access e-mails sent to or from
21 Canal employees on which you were not copied?

22 A. What time period?

23 Q. During your employment?

24 A. During my employment, um, there were times when
25 -- we had all -- there were times when I had to go and

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2 find a receipt or find information, that's why we kept
3 all the other employees e-mails active after they
4 resigned.

5 Q. So after -- so during the course of your
6 employment, if you wanted to, you could go in and see
7 e-mails sent to or received by the Canal Productions or
8 the Canal Productions e-mails of it's -- let me rephrase
9 the question.

10 So you had access to the e-mails that were
11 being sent and received by Canal employees; is that
12 right?

13 A. Technically yes.

14 Q. Did you have access to Bob's text messages?

15 A. Can you clarify in what way or when.

16 Q. During the course of your employment, did you
17 have access to Bob's text messages?

18 A. Only if he provided me his phone or computer.
19 And technically, I guess, but not -- I couldn't -- yeah,
20 just technically -- if he gave me his phone and asked me
21 to do something or gave me his computer and asked me to
22 do something, at that point, yes. But in general, no.

23 MR. DROGIN: Okay. Let me just go
24 through one more exhibit and then we'll take
25 that break that your attorney is asking about.

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2 Q. Over the course of the 11 years that you worked
3 for Canal, you understood that at times you would have
4 to work nights; is that right?

5 A. I was on call 24/7, yes. Many nights or
6 weekends.

7 Q. Right. Early mornings, correct?

8 A. Yes, I mean at times, yes.

9 Q. So sometimes you and Bob were actually in
10 different time zones, correct?

11 A. Yes.

12 Q. And sometimes you would have to do work while
13 you were on vacation; is that right?

14 A. I wouldn't -- I don't think that -- I wouldn't
15 characterize it that way.

16 Q. Okay. How would you characterize it?

17 A. I wouldn't characterize it that I was on
18 vacation. Bob and I had an agreement that I would work
19 while I was away. There were very, very, few vacation
20 days or days off that I took while I worked at Canal. I
21 was expected to be on call 24/7.

22 Q. Understood. So these were working vacations,
23 if you will?

24 A. I wouldn't even put the word vacation in there.
25 They were work while away, which is what Bob and I

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2 agreed to.

3 (Whereupon, a document Bate Stamped
4 Canal 45967-69 was marked as Exhibit T, for
5 identification, as of this date.)

6 Q. Okay. In Exhibit T, I know this is the same
7 e-mail that we've seen before, the last question I'm
8 going to ask you about it is, how did you make Canal
9 labor law compliant?

10 A. In meeting with you, Laurent Drogin and Hagit
11 Feder, I facilitated all the paperwork that needed to be
12 done with timesheets. At one point the um -- I mean
13 that was what I can recall at this moment.

14 Q. Alright. And if you had questions about wage
15 and hour law, you would call my firm?

16 A. Yes or I would speak to Michael Tasch or Tom
17 Harvey. Can you clarify, like, the time period or --

18 Q. The time period from when you started to make
19 Canal labor law compliant?

20 A. Bob -- Tom Harvey had referred me to you and I
21 had spoken to Bob about it. Bob was --

22 Q. Alright. It's fine. For overtime purposes,
23 you would give this information to Tasch?

24 A. I was asked by Michael Tasch to send him how
25 much -- like, how many hours overtime the employees

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2 would receive overtime.

3 Q. So you would send this to Tasch?

4 A. I would send the amount of overtime to Tasch.

5 Q. And you got that from the timesheets that the
6 employees would send you?

7 A. Yes.

8 Q. And you gave Tasch accurate information?

9 A. Yes.

10 Q. Did Bob review the timesheets before you sent
11 them to Tasch?

12 A. Not that I can recall.

13 Q. How did you know who was eligible for overtime?

14 A. It was a discussion with you and Hagit Feder.

15 Q. And what was your understanding as to when
16 Canal employees would be entitled to overtime?

17 MS. HARWIN: You mean legally or as a
18 practical matter, when they would be paid
19 overtime?

20 Q. Practical matter, what you understood.

21 A. I can't recall the specific hours that they
22 would receive. Because I think that they were -- I
23 can't recall exac -- I can't recall the exact hours.

24 Q. Okay. And in this lawsuit, you claim that
25 you're entitled to overtime; is that right?

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2 A. Yes.

3 Q. Did you ever instruct Michael Tasch to pay you
4 overtime?

5 A. No, not that I can recall.

6 Q. Okay. Wasn't one of the things that you
7 discussed with my law firm the fact that you were exempt
8 from receiving overtime?

9 A. With Michael Tasch, a discussion with Michael
10 Tasch?

11 Q. No, with my firm.

12 A. I don't recall us discussing that I wasn't
13 eligible for overtime. I don't think we really
14 discussed -- I think our conversations focussed on the
15 female executive assistants.

16 Q. Just a couple of more questions. In your
17 Complaint, you say that Bob was aware of his legal
18 obligation to pay overtime.

19 How did he come to have that knowledge?

20 A. Not only with the conversations that I had had
21 with him after discussing it with you, but through Tom
22 Harvey, Bob was aware. And again, everything that was
23 discussed with you or any paperwork was also reviewed
24 and approved by Bob.

25 Q. Didn't Bob tell you that he wanted you to try

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2 to avoid having the employees incur overtime?

3 A. Can you clarify what time period? Are we --

4 Q. Sure. When you discussed this with him?

5 A. In 2017, I don't recall him saying that.

6 Q. So in Paragraph 28 of your Complaint, you
7 recount a conversation where you said, Bob told you not
8 to pay overtime. We can look --

9 A. Yes.

10 Q. You know what I'm talking about?

11 A. Yes.

12 Q. So just tell us what happened in that
13 conversation from your perspective?

14 A. Bob had asked that I give one of the -- and I'm
15 quoting him "girls on call", whoever the girl was on
16 call, a key to his apartment. I had -- he discussed
17 wanting one of them to stop by and check on his
18 apartment for he and Tiffany while he was away. And I
19 had said that it might be better suited for the
20 housekeeper who is familiar with the house to do it.
21 And he said no, he wanted one of the girls to do it. I
22 reminded him that it was something that he would have to
23 pay extra for in overtime, and he got very upset and
24 said I am not going to pay them for the work that they
25 do in checking for his house, that he pays them enough

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2 and doesn't want to pay them overtime. I walked out of
3 -- from what I recall, I walked out of the apartment and
4 down the stairs saying that I wouldn't do anything that
5 was illegal. He had to pay them for the hours that they
6 worked.

7 Q. And did he?

8 A. I -- for the time that I was at Canal, I
9 believe he did, but that again, was at the tail end of
10 my employment with Canal.

11 MR. DROGIN: Okay. This is a good time
12 for the break. I'm sorry, I went a little bit
13 over. Let me know what time you'd like to
14 return. And can we also have a running total
15 as to how long we've been on the record.

16 THE VIDEOGRAPHER: Yes, just one moment
17 on that. We're off the record, it's 12:21 p.m.

18 (Whereupon, a luncheon recess was taken
19 from 12:21 p.m. to 1:01 p.m.)

20 THE VIDEOGRAPHER: We are back on the
21 video record, the time is 1:01.

22 Q. Ms. Robinson, did you speak with anyone during
23 the lunch break we just took?

24 MS. HARWIN: You mean other than
25 counsel?

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2 Q. My question was, did you speak with anyone,
3 it's a yes or no question?

4 A. Other than my counsel, no.

5 MS. HARWIN: Counsel, I apologize,
6 there's a noise that's going on in my house,
7 can you just hold on one moment for me to turn
8 it off.

9 MR. DROGIN: Sure. Let's go off the
10 record.

11 THE VIDEOGRAPHER: Sure. We're off the
12 video record. It is 1:02 p.m.

13 (Whereupon, a short break was taken.)

14 THE VIDEOGRAPHER: We are back on the
15 record it is 1:03 p.m.

16 Q. So my question was, did you speak with anyone
17 during the lunch break and I believe your answer is yes?

18 A. Yes.

19 Q. With whom did you speak?

20 A. My counsel.

21 Q. Did you discuss any aspect of the testimony
22 that you gave earlier this morning, without telling me
23 the details?

24 MS. HARWIN: I'm going to direct her
25 not to answer.

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2 MR. DROGIN: Simply as to whether or
3 not you spoke with a witness on a break from a
4 deposition about the substance of her
5 testimony?

6 MS. HARWIN: I'm not going to have her
7 answer a question about the substance of our
8 discussion.

9 MR. DROGIN: Even to confirm that it
10 didn't relate to her testimony?

11 MS. HARWIN: I'm going to direct the
12 witness not to answer.

13 Q. Alright. I want to -- I'll use your words. I
14 want to redirect you to the fall of 2018. There was a
15 conversation that you had with Bob where you were asking
16 about increasing your compensation and he told you that
17 he felt like you were shaking him down; is that correct?

18 A. I wouldn't characterize it in that way, no.

19 Q. Was there a conversation where Bob told you
20 that he felt you were shaking him down?

21 A. Yes, those words were brought up in a
22 conversation that I had with -- with him.

23 Q. And what were you discussing?

24 A. Um, we were discussing the amount of work um,
25 the hours that I worked -- I felt that I wasn't paid

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2 for. The work that I was doing of other people. Um, we
3 discussed, uh -- I had objected and didn't want to work
4 on the Toukie Smith items or the apartment items and um,
5 we had discussed -- I had discussed wanting to be
6 compensated for the hours that I worked.

7 Q. Okay. So my question was, you were talking
8 with him about money, correct?

9 A. Yes.

10 Q. And he told you that he thought you were
11 shaking him down; is that right?

12 A. I can't answer that without providing context.

13 Q. Did his remark to you that he felt you were
14 shaking him down upset you?

15 A. Yes.

16 Q. And you told Robin that the shake down comment
17 didn't have anything to do with Tiffany Chen; isn't that
18 right?

19 A. I can't recall speaking to Robin about --

20 MR. DROGIN: Okay. So we're going to
21 play a recording that's been produced as number
22 7160 at roughly the five minute 40 second point
23 in that recording.

24 MS. HARWIN: And can you identify the
25 span of how long the recording will go on.

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2 MR. DROGIN: I'll tell you after, I
3 don't really know.

4 MR. BENNETT: Just give me one moment,
5 please.

6 (Whereupon, the recording was played at
7 this time as follows:

8 MS. ROBINSON: It kind of just sounds
9 like one thing that, you know he and I agree on
10 in some way. But for Bob, I kind of tried to
11 gear him onto, like, supposedly kids are going
12 to be around or, like, something is going on
13 and in the end it was just -- I was being
14 attacked by Bob. And look, Bob and I yes, we
15 have had our problems. Like, when I asked for
16 the raise in October and, you know, and Bob's
17 response was, you know, okay Chase, just start
18 working less hours, I can't do it, I can't do
19 it. And then when I said I can't do the
20 apartment and I can't do the Toukie work which
21 is not my job and extra stuff, he ends up
22 saying that I'm shaking him down, and then --)

23 MR. DROGIN: Can you keep going with
24 that? If not --

25 (Whereupon, the recording was played at

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2 this time as follows:

3 MS. ROBINSON: And then it goes
4 through, like, me leaving and like, you know,
5 it's just been such tense fucking time with him
6 where, you know --

7 MS. CHAMBERS: What do you mean? What
8 do you mean?

9 MS. ROBINSON: It's just -- I don't
10 know what it is. It's just, like, I feel like,
11 you know -- the shake down comment hurt.

12 MS. CHAMBERS: Yeah.

13 MS. ROBINSON: Then I dealt with --
14 then I deal with the um -- I'm just trying to
15 sort my thoughts out right now. Um --

16 MS. CHAMBERS: You know what, you never
17 addressed that either, you never got to tell
18 him. You're holding so much in, Chase.

19 MS. ROBINSON: Oh no, then it was --
20 when finally, like I quit, I finally quit, he
21 started bullying me into kind of staying, not
22 wanting to speak about it.

23 MS. CHAMBERS: That's right. That's
24 right.

25 MS. ROBINSON: He ended up, like,

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2 stringing me along until, you know, giving up
3 an opportunity. We sat down. I mean you were
4 there. We sat down, I was in tears at that
5 point with Bob and I screaming at each other.
6 And Bob saying, that if I didn't give him any
7 notice, that I would -- he would give me a bad
8 recommendation, like, after 11 fucking years
9 --)

10 MR. DROGIN: We'll stop it there.

11 MS. HARWIN: Can you identify the time
12 stamp for the end of the clip, please.

13 MR. BENNETT: Seven minutes 24 seconds.

14 MS. HARWIN: Thank you.

15 Q. Okay. So in 2018 you actually gave notice that
16 you were leaving; isn't that right?

17 A. Yes.

18 MR. DROGIN: And we'll go to Exhibit U,
19 which, I think everything has been uploaded at
20 this point, not everything, but the next
21 couple.

22 (Whereupon, a document Bate Stamped
23 Robinson 00004504 was marked as Exhibit U, for
24 identification, as of this date.)

25 Q. Exhibit U. This was the resignation e-mail

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2 that you sent in 2018, correct?

3 A. I'm reading it.

4 MS. HARWIN: Counsel, are you
5 identifying the correct exhibit? This is an
6 e-mail that was not sent to Mr. De Niro.

7 Q. You know what, I think it was, but I think
8 you're right, we've just -- we probably just uploaded
9 the wrong one, but that's fine.

10 A. I don't.

11 Q. Okay. We'll -- we can come back to it. It's
12 not terribly important. Now when you resigned though,
13 in 2018, you gave Bob -- originally you gave him about
14 eight weeks notice; is that right?

15 A. I believe it was a little over two weeks -- uh,
16 two months.

17 Q. And then you extended it to 10 or 11 weeks?

18 A. No, I don't recall extending it.

19 MR. DROGIN: Okay. Can we play 7187 at
20 11 minutes and 10 seconds.

21 (Whereupon, the recording was played as
22 follows:

23 MS. CHAMBERS: Well, Chase, but it
24 seems like it was a pretty quick thing. It
25 wasn't like, six months. It was -- how much

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2 time did you give him?

3 MS. ROBINSON: No, I gave him two
4 months.

5 MS. CHAMBERS: Okay. So that was
6 probably --

7 MS. ROBINSON: I gave him a little shy
8 of eight weeks, a little shy of eight weeks.

9 MS. CHAMBERS: Right, right. Okay.

10 MS. ROBINSON: But there was no point
11 on me staying another week through the
12 Christmas holiday. Like, why pay me while
13 everybody is away and out of the office. Like
14 it just didn't make sense for me to and I
15 wanted to be in London by, you know, mid
16 January. So I wanted to take a break, I wanted
17 to have, like, you know, go for the rush and
18 then get out. Then I said, January, then I
19 kept saying January 7th. Bob that gave him 10
20 weeks or 11 weeks, I forgot whatever it goes
21 out to, I give him that. But he never wanted
22 to sit down and talk about, you know, me
23 leaving. He wanted to ignore, he wanted to say
24 it didn't happen. He bullied me, he was an
25 asshole to me for a while and was, like

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2 snapping at me about everything --

3 MR. DROGIN: We can stop it.

4 MS. HARWIN: Can you identify the time
5 stamp.

6 MR. DROGIN: Yeah, it's 11 minute and
7 10 seconds to approximately 12 minutes 25
8 seconds. And as I indicated, we'll send you
9 all the clips.

10 MS. HARWIN: Thank you.

11 Q. Alright. Does that refresh your recollection
12 as to whether you initially gave a little bit shy of
13 eight weeks and then you extended it to 10 or 11 weeks?

14 A. I don't recall having the conversation with Bob
15 about extending it. There were many times, like, that I
16 had reached out to him to try to meet with him. So it
17 may be in one of those conversations, but I can't recall
18 specifically other than in that recording giving him a
19 deadline of, like, right after the holidays or -- there
20 were many conversations of trying to discuss it with
21 him.

22 MR. DROGIN: Let's go to Exhibit V,
23 please.

24 (Whereupon, a document Bate Stamped
25 Canal 46029-30 was marked as Exhibit V, for

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2 identification, as of this date.)

3 MS. HARWIN: G you said?

4 MR. DROGIN: V as in Victor.

5 MS. HARWIN: Oh.

6 Q. Let me know when you're ready, I just have a
7 couple of questions about this.

8 A. I'm reading it.

9 Q. Okay. So in this e-mail you were asking him
10 for a raise, is that right among other things? Should
11 we go off the record?

12 A. Can you repeat your question, I was reading it
13 while you were --

14 Q. Yeah, in this e-mail you, among other things,
15 you were asking him for a raise; is that right?

16 A. Yes, he and I --

17 Q. And you compared your compensation to Dan
18 Harvey, correct?

19 A. This is one of the times that I did, yes.

20 Q. Well, I'm just talking about this document and
21 as a follow-up to this conversation he -- Mr. De Niro
22 increased your compensation from 200,000 a year to
23 300,000 a year; is that right?

24 A. I wouldn't characterize it that way.

25 Q. What was your salary at the time that you wrote

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2 this e-mail? Wasn't it \$200,000 a year?

3 A. My base salary was 200.

4 Q. And did you get a 100,000 a year increase?

5 A. After my meeting with --

6 Q. Just yes or no?

7 A. Yes, in 2019.

8 Q. So 200,000 plus 100,000 is 300,000, right?

9 A. Yes.

10 Q. That was your new salary?

11 A. My base salary was going to be 300.

12 Q. You actually turned down a position in order to
13 stay on with Canal, didn't you?

14 A. I wouldn't characterize it in that way.

15 Q. Did you have an offer of employment that you
16 turned down?

17 A. No, not an offer and I wouldn't characterize it
18 in that way.

19 Q. Well, did you turn down another position?

20 A. I turned down an opportunity.

21 Q. Did you have an offer?

22 A. I wouldn't characterize it that way. I would
23 say it was a job opportunity which is -- which is what
24 it was.

25 Q. So it wasn't an offer, right?

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2 A. I --

3 Q. Right?

4 A. It was an opportunity.

5 Q. Did you have a job offer? Question mark.

6 MS. HARWIN: Counsel, please do not
7 yell.

8 Q. Yes or no?

9 A. As I said, it was not a job offer.

10 Q. Thank you. So if you told someone that you
11 turned down a job offer, that would have been a lie,
12 right?

13 A. I don't believe I said it was a job offer. I
14 believe I said that it was an opportunity. I've always
15 said it was an opportunity.

16 Q. Got it. And who was that opportunity with?

17 A. The opportunity was what I was planning on
18 doing was starting my own production company, working on
19 my own script and applying for a business school. That
20 was my opportunity was going out on my own with my
21 scripts, that was the time I was ready to do so.

22 Q. So do you recall telling people that you had
23 turned down a position?

24 A. I recall saying it was a job opportunity or an
25 opportunity or career opportunity, but not -- I don't

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2 recall a position or an offer.

3 Q. Okay. Well, we've got plenty of -- we won't
4 bother with those tapes. Now you met with Bob on
5 January 3, 3019; isn't that right?

6 A. Yes.

7 Q. And following that meeting you decided to stay
8 with Canal, correct?

9 A. I had no choice but to stay.

10 Q. Were you threatened with bodily harm if you
11 followed through on your resignation?

12 A. Bob had said he would give me a bad
13 recommendation.

14 Q. And that's why you stayed?

15 A. I felt forced to stay as Bob -- I had done on
16 multiple occasions trying to resign and Bob bullied me,
17 this time he stated he would give me a bad
18 recommendation. I feared retaliation.

19 Q. A bad recommendation why?

20 A. For leaving him.

21 Q. Just for leaving?

22 A. For leaving him. I discussed this with Robin
23 as well.

24 MR. DROGIN: I'm not up to that, yet.

25 Can we go to Exhibit W.

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2 (Whereupon, a document Bate Stamped

3 Robinson 00000008 was marked as Exhibit W, for

4 identification, as of this date.)

5 Q. Do you see Exhibit W?

6 A. Yes.

7 Q. Now here you say, "it's been so busy I haven't

8 had a chance to send you an e-mail to say thank you for

9 the meeting, so thank you. We discussed a lot, could

10 you give me until tomorrow morning to think it through."

11 Do you see that?

12 A. Yes.

13 Q. Now the comment where you say he threatened to

14 give you a bad recommendation if you left, that was

15 actually made in November; isn't that right?

16 A. No.

17 Q. When was it made, do you remember?

18 A. It was made at a meeting in December with Bob

19 and Robin Chambers.

20 Q. So you just testified that you felt forced to

21 leave because you were threatened that if you left he'd

22 give you a bad recommendation. What were you thinking

23 --

24 MS. HARWIN: Counsel, I think you made

25 an error in your phrasing. I think you meant

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2 forced to stay, not forced to leave.

3 MR. DROGIN: Forced to stay. Forced to
4 leave comes later. Yeah I'll rephrase it.

5 Q. What were you thinking through?

6 A. I wanted to leave. I wanted to depart Canal
7 Productions. I had spoken to Bob resign and he refused
8 to allow me to leave. He said that he would give me a
9 bad recommendation and I was thinking how could I
10 depart, you know, and balancing the fact that he said
11 that he would give me a bad recommendation and I felt
12 bullied to stay.

13 Q. Alright. Now the deal that you made with him,
14 that was a two-year commitment, right?

15 A. We had discussed transitioning --

16 Q. Yes or no.

17 A. I wouldn't be able to answer it a yes or no
18 without context.

19 Q. Okay. Now whatever that agreement was, it was
20 never memorialized in writing; isn't that true?

21 A. I can't recall a specific document of where it
22 was.

23 Q. Okay. Now isn't it true that the actual
24 comment Bob made was that he would give you a bad
25 recommendation if you left him in the lurch?

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2 A. I wouldn't characterize -- I don't think that's
3 correct. I wouldn't characterize it that way.

4 MR. DROGIN: Okay. Let's hear what you
5 had to say at that time. 7186 from 34:40 to
6 34:50.

7 Q. Before you play it, Robin Chambers was present
8 when that comment was made, wasn't she?

9 A. Yes, but that was -- just to clarify the bad
10 recommendation.

11 MR. DROGIN: Yes, let's hear it.

12 (Whereupon, the recording was played at
13 this time as follows:

14 MS. ROBINSON: And because Bob, was
15 just, you know, doing the whole bullying thing
16 and being an asshole and saying, if you leave
17 me in the lurch I'll give you a bad
18 recommendation and stuff like that, I said --

19 MR. KAPLAN: You had a job offer and
20 you --)

21 MR. DROGIN: Can we continue to play
22 that.

23 MR. BENNETT: Let me start over.

24 MR. DROGIN: Yeah, just play it. I
25 didn't even realize Kaplan used the word job

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2 offer, let's hear what she says.

3 (Whereupon, the recording was played at
4 this time as follows:

5 MS. ROBINSON: I had to get Robin
6 looped into the whole thing because Bob was
7 just, you know, doing the whole bullying thing
8 and being an asshole and saying, if you leave
9 me in the lurch, I'll give you a bad
10 recommendation and stuff like that.

11 MR. KAPLAN: Hold on, so you had
12 another job offer? And --

13 MS. ROBINSON: Are you fucking kidding,
14 me?

15 MR. KAPLAN: You should have talked to
16 me, I would have told you to take the other
17 job, God damn it. That would have been the
18 perfect time to --

19 MS. ROBINSON: I felt bad because -- I
20 gave job, like, you know, my two months notice.
21 Like, I gave it to him in November when I got
22 back from London, I said I'm leaving --)

23 MR. DROGIN: You can stop. I thought
24 there was more about the job offer. I know it
25 appears at multiple places in the tape.

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2 Q. Okay. Does that --

3 MS. HARWIN: Can we verify the time
4 stamp of what was just played.

5 MR. DROGIN: Yeah, it starts at 34:40.

6 MS. HARWIN: And when does it end?

7 MR. DROGIN: I don't know, we'll send
8 it to you.

9 MR. BENNETT: 35:50.

10 MR. DROGIN: Yeah, let's not waste
11 time. You have all these. We'll give you all
12 the information.

13 MS. HARWIN: We need a clear record for
14 the transcript as to what was played and what
15 the exhibits are that are being used in the --

16 MR. BENNETT: Counsel, it's being
17 recorded. I mean, I don't think there's going
18 to be any discrepancy or any confusion.

19 MS. HARWIN: We need a record for the
20 transcript.

21 MR. DROGIN: Let's not waste time.
22 Please record me saying let's not waste time.
23 I want to get through this.

24 Q. Now does that refresh your recollection as to
25 whether or not Mr. De Niro actually said, if you leave

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2 me in the lurch, I will give you a bad recommendation?

3 A. It was part of --

4 Q. Yes or no, it either refreshes your
5 recollection or it doesn't?

6 A. I cannot answer yes or no without context.

7 Q. Okay. So and that was an actual threat he
8 made, right?

9 A. Yes, he made a threat.

10 Q. You believed him, didn't you?

11 A. Yes.

12 Q. Did Robin agree with you?

13 A. Robin --

14 Q. Yes or no, did Robin agree with you?

15 A. She agreed that it was a threat.

16 Q. Did she agree with you that it was a real
17 threat, yes or no? If you say yes, I'm dumb -- done --
18 I'm dumb. I'm done. If you say no, it's no.

19 Question, did Robin agree with you that this
20 was a real threat?

21 A. I don't know.

22 MR. DROGIN: Okay 7174 at one hour 18
23 minutes 25 seconds. You spent a lot of time on
24 the phone during working hours, I'll tell you
25 that.

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2 MR. BENNETT: After Ms. Robinson
3 provides an answer, if we could take a very
4 brief break, less than five minutes, I would
5 appreciate it.

6 MR. DROGIN: Yeah.

7 (Whereupon, the recording was played at
8 this time as follows:

9 MS. CHAMBERS: Yeah, yeah, yeah.

10 MS. ROBINSON: You know, I mean I think
11 my relationship with Bob has changed since he
12 got back anyway. You know, I mean I think,
13 there were things that he said to me, you know,
14 and while you say that he felt hurt, I mean, to
15 say that he would give me a bad recommendation,
16 I mean -- I couldn't -- like when you heard
17 that, like -- I mean, wouldn't you take offense
18 to that? You were sitting right next to me. I
19 took such offense to that.

20 Ms. CHAMBERS: No, no, because I don't
21 buy his stupid threats. Number one, I know
22 him, I've heard him say that before about other
23 people. Well, fuck it, you've heard him say it
24 about -- I won't give them a good
25 recommendation -- he doesn't mean it, he's

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2 never -- you know, I've never known him to --
3 he just says those things in anger. It was
4 stupid sounding frankly.)

5 MR. DROGIN: Stop.

6 MS. HARWIN: Time stamps.

7 MR. BENNETT: I'm sorry, I actually --
8 that was my mistake, I actually closed it out.

9 MR. DROGIN: We'll get it to you.

10 Q. Did you believe it was a serious threat?

11 A. I'm sorry, can you repeat --

12 Q. Did you believe it was a serious threat?

13 A. Yes.

14 Q. Now in that clip, you heard yourself say that
15 your relationship with Bob had changed since he got
16 back. Did you hear that?

17 A. Yes.

18 Q. Got back was got back from [REDACTED] right?

19 A. I don't know. I don't know when that recording
20 was from. Robin and I had many conversations.

21 MR. DROGIN: Okay. Greg, do you want
22 to take a break?

23 MR. BENNETT: Two minutes, yes, please,
24 if we could. Before we -- we can go off the
25 record, I just have a quick question for Brooke

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2 when we're off.

3 THE VIDEOGRAPHER: We are off the video
4 record it is 1:26 p.m.

5 (Whereupon, a recess was taken at this
6 time.)

7 THE VIDEOGRAPHER: We are back on the
8 video record. It is 1:31 p.m.

9 Q. Ms. Robinson, you actually took steps to resign
10 in 2014, didn't you?

11 A. I can't recall. There were multiple times that
12 I tried to resign.

13 Q. You tried to resign in 2015?

14 A. I don't recall in 2015.

15 Q. Okay. Remember a little while ago we saw a
16 resumé that you sent to your mother back in 20 -- I
17 think it was 2015.

18 Does that refresh your recollection?

19 A. I'd have to go back and look to see what the
20 date of that was.

21 Q. Alright. Now the deal that you struck with Bob
22 in 2019, one of the things that it included was a
23 clearer definition of your job duties; is that right?

24 A. Uh, I -- part of it was.

25 Q. At that time you had been pulled into doing

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2 work at [REDACTED] is that right?

3 A. Yes, it became a -- yes.

4 Q. And that wasn't part of your job as Vice
5 president of production and finance, correct?

6 A. Yes.

7 Q. So one of the things in the deal that you
8 struck in January 2019 is that you would have less
9 involvement in [REDACTED] is that right?

10 A. There were only four items that I would finish
11 with the design and then I would have no other
12 involvement in [REDACTED]

13 Q. Right. And the deal also included the
14 understanding that you would be transitioning out over a
15 two-year period, correct?

16 A. That was part of the discussion that I had with
17 Bob.

18 Q. That was --

19 A. It was part of it, yes.

20 Q. And one of the reasons that you agreed to stay
21 on in this fashion was because you felt bad for Bob and
22 everything that he was going through in his life at that
23 time; is that correct?

24 A. I think a small portion, yes.

25 Q. He had just come back from [REDACTED] correct?

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2 A. Yes.

3 Q. He was going through a divorce?

4 A. He was going through a separation at that time.

5 Q. And then there was a part of you that loved
6 Bob; is that right?

7 A. I wouldn't say that it's correct loving Bob,
8 but I would say that there were times that I did enjoy
9 my job, I did enjoy working for Bob.

10 Q. One of the other things that was going on was
11 that Bob's kid's didn't like Tiffany, isn't that true?

12 A. What time period are we -- still January?

13 Q. Yeah, early 2019?

14 A. I don't know when I became aware that Bob's
15 children did not like her.

16 MR. DROGIN: Alright, can we go to
17 audio clip 7186 at 36 minute to 36 minutes and
18 36 seconds.

19 (Whereupon, the recording was played at
20 this time as follows:

21 MS. ROBINSON: Talking to him about I
22 will get you -- I will get you a career
23 assistant, you know, for the office when
24 Gillian needs or finds someone, like, it will
25 all be smooth and right in the next two years.

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2 But Kap, I'm not fucking doing this for the
3 rest of my life. But did I feel bad that Bob
4 had just gotten out of [REDACTED] was in the middle
5 of a divorce, like, the part of me that loves
6 Bob because I worked for him for 11 years said
7 okay, I'll fucking -- okay, I'll fucking stay
8 for a little bit more time, like, you know,
9 whatever. You know, I'll do it. As long as I
10 have my flexibility, being able to travel to
11 London and I can work on whatever, that's
12 fine.)

13 Q. Does that refresh your recollection as to
14 whether there was a side of you that stayed because you
15 loved Bob?

16 A. I don't think that the way that I used -- okay.

17 Q. It's just a yes or no question. It either
18 refreshes your recollection or it doesn't?

19 A. I don't think that I can answer that without a
20 clarification, the yes or no.

21 Q. Alright. So that arrangement was supposed to
22 begin immediately, the January agreement?

23 A. Yes, that was in our discussion.

24 Q. Right now, by February, the end of February,
25 2019, you had already updated your resumé and were

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2 thinking of leaving again; isn't that true?

3 A. No, I wouldn't say that's correct.

4 MR. DROGIN: Alright. Let's take a
5 look at Exhibit X.

6 (Whereupon, a document Bate Stamped
7 Robinson 00004642 was marked as Exhibit X, for
8 identification, as of this date.)

9 MS. HARWIN: Is this the same exhibit
10 that was previously introduced as a different
11 exhibit number?

12 MS. LAZZARO: Yes.

13 MS. HARWIN: Can we make this one
14 unitary exhibit?

15 MR. DROGIN: You know we've marked them
16 all, so it's going to be easier if we just have
17 it duplicated. In a perfect world --

18 Q. Ms. Robinson, is it fair to say that by the end
19 of February, you were having some misgivings about
20 whether or not Bob was living up to the terms of your
21 agreement?

22 A. Can you repeat your question, sorry.

23 Q. Yeah. Is it fair to say that by the end of
24 February, you were having some misgivings as to whether
25 or not Bob was prepared to live up to his end of the

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2 agreement?

3 A. I don't think I would characterize it in that
4 way -- I think there were items --

5 Q. So the answer is --

6 A. I wouldn't characterize it in that way.

7 Q. But you had concerns that the agreement had not
8 been followed by Bob; is that true?

9 A. I feel that there were items that --

10 Q. Just a yes or no.

11 A. Uh, can you repeat your question.

12 MR. DROGIN: Yeah, can you read it back
13 and Britt, can you upload some documents, you
14 know X and Y.

15 (Whereupon, the record was read by the
16 reporter.)

17 THE WITNESS: I can't recall when, you
18 know, I wouldn't -- I just wouldn't
19 characterize it in that way, that wasn't --
20 yeah, I wouldn't characterize it in that way.

21 MR. DROGIN: Britt can you put in X and
22 Y.

23 MS. LAZZARO: They should be there, I
24 see them on my end.

25 MR. DROGIN: I don't see them, can you

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2 do it again.

3 MS. LAZZARO: Yeah.

4 Q. In February of 2019 had you phased out of the
5 four projects that were supposed to wrap up your
6 involvement with [REDACTED]

7 A. No.

8 Q. So you were still involved in [REDACTED] at the end
9 of February?

10 A. Yes.

11 MR. DROGIN: Now let's take a look at
12 Exhibit X.

13 MS. HARWIN: Is this the same document
14 we were just looking at as exhibit --

15 MR. DROGIN: Probably, yeah, I think
16 you had asked that, yeah, this is an e-mail
17 from Chase to her mother with the resume that
18 we did talk about earlier, it's here again.

19 Q. Do you see that Ms. Robinson?

20 A. Yes.

21 Q. So you e-mailed a copy of your resumé to your
22 mother on February 24, 2019; is that right?

23 A. I drafted it.

24 Q. And is it your testimony that as of February
25 24th you were not thinking about leaving?

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2 A. No, I wasn't thinking about leaving.

3 MR. DROGIN: And then in exhibit Y,
4 please --

5 (Whereupon, a document Bate Stamped
6 Robinson 00004648 was marked as Exhibit Y, for
7 identification, as of this date.)

8 Q. Do you see Exhibit Y?

9 A. Yes.

10 Q. So you e-mailed yourself two bullet points, one
11 says business applications and the other says
12 recommendation letter.

13 Do you see that?

14 A. Yes.

15 Q. Do you recall why you e-mailed this to
16 yourself?

17 A. Yes, it was in preparation for looking at
18 business schools.

19 Q. And the recommendation letter?

20 A. Again, you would need recommendation letters
21 for business school.

22 Q. So as of February 28th or 29th, it was your
23 plan to go to business school; is that right?

24 A. My plan is always whether resigning in 2018 or
25 after I resigned in 2019, my plan was to start my own

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2 production company, work on my development projects and
3 apply to business school.

4 Q. Alright. So you have -- you've -- in January
5 you reach an oral agreement with Bob that you would
6 transition out over two years, correct?

7 A. Yeah, around two years.

8 Q. And roughly two months later, you've sent your
9 resumé to your mother, correct?

10 A. It's correct that I sent my resumé to my
11 mother.

12 Q. And you've e-mailed yourself a reminder, I
13 guess, to do something with business applications and a
14 recommendation letter, correct?

15 A. For -- for business school, not for applying
16 for jobs.

17 Q. Was it your plan to go to business school
18 within that two-year window that you had committed to
19 remain with Canal?

20 A. I don't think I had thought about whether I
21 would during that time. I just wanted to prepare for
22 when I do, because business school isn't something that
23 you just tomorrow apply for. It's something that you
24 think of, take the GMAT's again there was a process that
25 goes with it, it's not a --

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2 Q. Didn't you tell Robin that you had begun to
3 prepare your resumé in February of 2019 because Bob
4 wasn't living up to his end of the deal?

5 A. I can't recall. There were so many
6 conversation and so much chaos during that time.

7 MR. DROGIN: Alright. We'll get to
8 that case in just a minute. Let's go to
9 Exhibit Z. I actually think was marked earlier
10 as well, this is a personal statement.

11 MS. LAZZARO: Exhibit Z is a partial
12 copy of Exhibit P.

13 THE WITNESS: It's not downloading for
14 me. It just keeps spinning round and round.

15 (Whereupon, a document Bate Stamped
16 Robinson 00005155 was marked as Exhibit Z, for
17 identification, as of this date.)

18 Q. You can go back to P, it's the same exhibit.

19 A. I got Z up.

20 Q. In this document on the first page in the last
21 paragraph, fourth line down you wrote, "I also learned
22 that one of the most powerful assets of any company is
23 adaptability and willingness to change when the
24 situation, project, or employee requires it."

25 Do you see that?

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2 A. I'm missing what paragraph you're on. Second
3 paragraph?

4 Q. It's in the last paragraph on the first page
5 it's on the fourth line down and it's the sentence that
6 starts, "I also learned that one of the most powerful
7 assets of any company is adaptability and willingness to
8 change."

9 Do you see that?

10 A. Yes.

11 Q. Were you describing that as an asset that you
12 possessed?

13 A. Not that -- I don't read it as that I
14 possessed. I read it as one of the most powerful assets
15 of a company is being able to adapt and to change to a
16 situation or -- you know, if an employee requires it.

17 Q. But as part of your personal statement, were
18 you saying that you possess those abilities?

19 A. Let me read my personal statement.

20 Q. I'm just asking you about that sentence though.
21 I'm not asking you about the entire personal statement.
22 I'm just asking whether you attribute those abilities to
23 yourself?

24 A. I attribute it to something that I've learned
25 while working at Canal Productions.

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2 Q. Okay, so do you possess those attributes?

3 A. Being able to adapt, willingness to change,
4 putting that line aside, I would say yes.

5 Q. Now in -- beginning in 2018, Tiffany had been
6 pulling a whole bunch of employees onto the [REDACTED]
7 project; isn't that right?

8 A. In the beginning of 2019?

9 Q. I actually think it went back --

10 MR. DROGIN: Stop.

11 Q. I actually think it went back before then into
12 2018?

13 A. I don't -- sorry, that's a distraction. No --

14 MR. DROGIN: What distraction?

15 MS. HARWIN: Why don't you wait until
16 the dog stops barking?

17 THE WITNESS: No, I don't believe that
18 would be a correct statement.

19 Q. At some point wasn't Tiffany making Canal
20 employees do things for [REDACTED]

21 A. She was having me handle items for her for [REDACTED]
22 in 2019.

23 Q. Wasn't she also doing that with other employees
24 too, other Canal employees?

25 A. At times Mike Kaplan regarding fixing items and

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2 --

3 Q. So the answer is yes?

4 A. Mike Kaplan and myself, yes.

5 Q. And Lulu?

6 A. Lulu --

7 Q. Yes or no, was she one of the people who was --

8 A. She was involved in the [REDACTED] --

9 Q. Was Sabrina involved?

10 A. As I said at the very beginning of the project,
11 but for a very short period of time.

12 Q. Okay. Now in 2019, Michael Kaplan had [REDACTED]
[REDACTED], right?

14 A. Yes.

15 Q. [REDACTED]
[REDACTED]

17 Q. That increase created even more pressure on the
18 Canal employees who were pitching in at [REDACTED] isn't that
19 right?

20 A. I would say that it was correct that it put
21 more pressure on me at [REDACTED] other -- the other
22 employees other than Lulu helping out were not involved
23 at the 117A project.

24 Q. Alright. Now Tiffany made it clear to you by
25 some of the comments that she made that she did not want

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2 you in the apartment -- in the apartment, the townhouse,
3 [REDACTED] however, you want to refer to it; isn't that true?

4 A. I wouldn't characterize it in that way. I
5 would say it's a feeling that I got from some of her
6 behavior and comments that she didn't want me involved
7 in the [REDACTED]

8 Q. So you're saying it wasn't very clear; is that
9 what you're saying?

10 A. If you're saying -- clarify, the beginning of
11 2019 or when is the time period that you're asking
12 about?

13 Q. I'll rephrase the question. Did Tiffany make
14 it very clear based on several comments that she made
15 that she did not want you in the apartment?

16 A. It was --

17 Q. Yes or no?

18 A. I wouldn't be able to answer it as a yes or no.

19 MR. DROGIN: Okay. Let's play the
20 clip, 7174 from 59:50 to one hour and 28
21 seconds. So it looks like it's a 38 second
22 clip. Let's hear it.

23 (Whereupon, the recording was played at
24 this time as follows:

25 MS. ROBINSON: --January, February,

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2 about being anywhere near that house.

3 MR. KAPLAN: Right.

4 MS. ROBINSON: She made it very clear
5 on several comments that she made that she did
6 not want me there. She made several looks at
7 me, you know, it was just -- it was like, get
8 the fuck out of my house. You know, so, you
9 know, I did. And you know, look, one thing
10 that she does have is, yes, it's her home with
11 Bob, you know, it's their home, you know. So I
12 don't want to be in the middle of it, but, you
13 know, it's just -- it is -- it's just -- I
14 don't know, I try to stay out of it, and I keep
15 getting pulled back in.)

16 MR. DROGIN: You can stop.

17 Q. Alright. So does that refresh your
18 recollection as to whether Tiffany made it very clear
19 that she did not want you in the apartment, sounds like
20 it was in or around January or February of 2019?

21 A. Yeah, there were certain -- it refreshes my
22 that there were certain comments and again, certain
23 looks or behavior, that made me feel that she didn't,
24 but she didn't come out and say, I don't want you
25 involved.

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2 Q. So the answer is yes, and you stand by the
3 audio recording that you made, correct?

4 A. Yes. At that moment yes, that's what the
5 discussion was.

6 Q. And at one point she used the phrase there were
7 too many cooks in the kitchen; is that right?

8 A. I don't recall her using that.

9 Q. The [REDACTED] work that she was pulling you into
10 differed from the four projects that you had agreed to
11 say on with when you spoke with Bob in January, isn't
12 that right?

13 A. There were additional items.

14 Q. She kept pulling you in adding more and more
15 things to your task list that you were not supposed to
16 have to be doing; isn't that what was going on?

17 A. I wouldn't clarify -- let me clarify that it
18 was both Bob and Tiffany giving me the same thing. They
19 were CC'd on everything together, they were in
20 conversation together. It was the two of them that were
21 giving me this additional work that was not something
22 that Bob and I had discussed.

23 Q. Fair enough. Okay. And the last time that you
24 were actually physically in [REDACTED] was December of 2018;
25 isn't that right?

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2 A. That is not correct.

3 Q. Alright. When was the last time you were in
4 [REDACTED] that you recall?

5 A. That I recall --

6 MR. DROGIN: We'll leave it blank in
7 the transcript, so you can just fill it in.

8 THE WITNESS: Can I -- I think it was
9 around the end of March 2019.

10 Q. Alright. Now, Tiffany -- in your opinion,
11 Tiffany would draw you in to the [REDACTED] project because
12 she wanted to dictate to you; isn't that right?

13 A. I think -- I don't think that is correct. I
14 think that it would -- it was one of many reasons.

15 Q. Alright. And was it your opinion that Tiffany
16 hates people who have Bob's ear?

17 A. I can't recall --

18 Q. Okay. Well, I can help.

19 A. I can't recall on Tiffany. I do recall saying
20 that about Grace.

21 MR. DROGIN: 7174, it's a 15-second
22 clip from 48:55 to 49:10.

23 MR. BENNETT: Give me one second,
24 please.

25 (Whereupon, the recording was played at

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2 this time as follows:

3 MS. ROBINSON: January, February about
4 being anywhere near that house.

5 MR. KAPLAN: Right.

6 MS. ROBINSON: She made it very clear
7 on several comments that she made that she did
8 not want me there. She made several looks at
9 me, you know it was just -- it was like, get
10 the fuck out of my house. You know, so -- so
11 you know, I did. And you know, look, one thing
12 that she does have, is yes it's her home with
13 Bob, you know it's their home, you know, so I
14 don't want to be --)

15 MR. DROGIN: I don't think that's the
16 right clip, is that 7174?

17 MR. BENNETT: Yes, but it's the wrong
18 site. So I think the one you want to open is
19 7209.

20 MR. DROGIN: That's okay. We have the
21 testimony on the record and we have the --

22 Q. Was one of the things that you agreed to wind
23 down with Bob this mold issue in [REDACTED]

24 A. No, that was not one of the items.

25 Q. So that was one of the things that Bob and

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2 Tiffany brought you back into even though it wasn't part
3 of your job, right?

4 A. Yes.

5 Q. And then there was a painting issue that came
6 up when there was some misunderstanding about the Robert
7 De Niro, Sr. paintings that you got dragged into; isn't
8 that right?

9 A. There was an issue with the paintings. I had
10 received e-mails about -- about that that were --

11 Q. Right. And that wasn't one of the four things
12 you had agreed to; isn't that true?

13 A. Yes.

14 Q. There was also some door issue that you got
15 dragged into, that wasn't part of your job, right?

16 A. That was one of the four items was the door, was
17 finishing the door. But it was something that Bob and I
18 had discussed -- it was just something that was going to
19 take a little bit longer because they were being made.

20 Q. So is it fair to say, Chase, that there were
21 boundary issues here, that you had your job, you had
22 worked out this arrangement with Bob and then you're
23 getting dragged into to these tasks relating to [REDACTED] is
24 that really what was going on here?

25 A. That was the constant in my job from the-get-go

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2 is that we would have to realign and Bob would cross the
3 boundaries and forget the agreement and then I would
4 have to realign my job. It was incredibly frustrating
5 to have to do that.

6 Q. Right. And I'll grant you this, that really
7 does come true, that the lines have been blurred here
8 and it was difficult for you to know what people
9 actually wanted you to do or not do; is that true?

10 A. Can you give me more clarification on --

11 Q. Yeah, yeah, the rules kept changing. As an
12 example, at one point, you were told to copy Tiffany on
13 e-mails, and then you were told don't copy Tiffany on
14 e-mails as an example.

15 A. I don't recall that.

16 Q. Alright. But if somebody didn't respond fast
17 enough to an e-mail that was sent by Tiffany, you would
18 get blamed for it?

19 A. I can recall an incident in speaking to Tom
20 Harvey and Michael Tasch about that I was being targeted
21 base on my gender by Tiffany, and being blamed for
22 people not getting back to her. She blamed me.

23 MR. DROGIN: Right, but you see, now I
24 got to move to strike everything that you said
25 there. Because we're not -- I'm just asking --

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2 Q. I'm actually trying to agree with you that this
3 was somewhat of a shit show that you kept getting
4 dragged into this stuff and you were getting mixed
5 messages. I have here in my notes, one time she said
6 she didn't want you involved, but then there was a
7 incident where she got mad at you because you weren't
8 communicating with her?

9 Is it fair to say you were getting really mixed
10 and confusing messages from Tiffany and Bob about what
11 you should or shouldn't be doing at this time?

12 A. I was following what my employer Bob asked of
13 me.

14 Q. But it was conflicting and confusing at times;
15 isn't that true?

16 A. At the tail end of my employment in some way --
17 I mean during the February and March, with the constant
18 harassment about the apartment issues and um, being
19 constantly dragged into their domestic life, it was
20 difficult, there were all these tasks, whether it was
21 Tiffany asking me to do every demeaning tasks or Bob to
22 be doing stuff that Tiffany wanted to do,
23 stereotypically female stuff, it was very frustrating
24 and made a very difficult situation. And I was being
25 harassed the way that I was by Bob and Tiffany about the

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2 apartment items. It became very difficult to do my job
3 on the --

4 MR. DROGIN: Again, I have to, you
5 know, strike everything that you said. I'm
6 actually trying to agree with you.

7 Q. Because in listening to these tapes and seeing
8 these e-mails, you were between a rock and a hard place,
9 weren't you?

10 MS. HARWIN: Can you clarify what
11 period you're referring to?

12 MR. DROGIN: Yeah, let's go to March of
13 2019, right up to the time you resigned.

14 THE WITNESS: At the end of March 2019
15 it just became impossible. Like, I didn't -- I
16 was under such emotional distress at that point
17 with everything, that I -- I -- yes, I was
18 between a rock and a hard place. I was -- you
19 know.

20 Q. Damned if you do, damned if you don't. There
21 was nothing you could do right, it was going to upset
22 one of them; is that fair? I'm not trying to put words
23 in your mouth, but I -- we've heard --

24 A. I don't know if I would say it would be fair
25 because I was doing what my employer was asking of me.

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2 Q. Okay. And in fact the employer here was giving
3 you conflicting instructions at times; isn't that true?
4 That's one of the problems. It was very difficult to
5 follow those instructions because they were either
6 incomplete or they were conflicted?

7 A. I don't -- I wouldn't -- I wouldn't say that it
8 was Bob that was giving me most of the conflicting work.
9 It was Tom Harvey and Michael Tasch and what they were
10 saying to be done vetoing Bob and being put in this rock
11 and a hard place and speaking to them. And it just
12 became very, very, toxic and hostile and very
13 uncomfortable and very difficult to work. I was at the
14 time not eating or sleeping, I was having emotional
15 breakdown.

16 Q. Alright. Now one of the things that happened
17 toward the end of March was that Tiffany wanted Lulu to
18 work with her in the apartment as opposed to working
19 with you on your main duties and responsibilities; is
20 that right?

21 A. No, I would not say that is correct. To
22 clarify, it was the beginning of -- it was the beginning
23 of April when Bob put Tiffany in touch with Lulu and
24 took her away from being my assistant, demeaned me --
25 yelled at me in front of the other employees and took

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2 the person who is supposed to be my assistant away from
3 me and repurposed her for Tiffany and the house.

4 Q. Right. And it wasn't nice for her to take your
5 assistant away from you?

6 A. It was disrespectful.

7 Q. Disrespectful to take your assistant away from
8 you.

9 A. In front of -- in front of -- and berating me
10 in front of the house.

11 MR. DROGIN: Understood. Now even as
12 late as April 4th, if we go to Exhibit -- we're
13 at double A, right? We did Z, can we do double
14 A, please.

15 (Whereupon, a document Bate Stamped
16 Robinson 00001602 was marked as Exhibit AA, for
17 identification, as of this date.)

18 Q. This is an e-mail you sent to Bob on April 4,
19 2019. And you reference here, you say, I've worked for
20 you for 11 years. I bent over backwards and done
21 everything and anything you've asked. We addressed part
22 of an issue yesterday and I thought we better -- we were
23 in a better place through mutual understanding.

24 Do you see that? Do you see that?

25 A. I'm reading it first. Yes, I see that.

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2 Q. Alright. And then you say, of course I won't
3 go to London if you need me. You have always come first
4 but I need to sit down with you and we need to discuss
5 the going forward expectations from me in my position.
6 Under the circumstances, the current responsibilities of
7 my position are unclear, although I thought we clarified
8 them in January. As you recall in January you increased
9 my salary and altered the duties of my position
10 effective for the next two years, I turned down another
11 position in reliance upon our understanding.

12 Do you see that?

13 A. Yes.

14 Q. So is it fair to say that as of April 4, 2019,
15 there was still this lack of clarity about your duties
16 and responsibilities?

17 A. It was heading in the direction that I had
18 faced on many occasions during my employment at Canal,
19 where the lines were blurred, I was no longer doing the
20 job that was commensurate to my title and at this point,
21 I was working in their domestic home --

22 Q. I'm just asking whether the current
23 responsibilities of your position were unclear as of
24 April 4, 2019, as you wrote in the e-mail? That's my
25 only question.

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2 A. Yes, I would say yes.

3 MR. DROGIN: Yes is fine. Yes is fine.

4 It keeps it short.

5 MS. HARWIN: Sorry, Counsel, can we

6 just take a three-minute bathroom break when

7 you're at a good moment.

8 MR. DROGIN: Yeah, sure, sure, sure.

9 Q. Then you say, I turned down another position in
10 reliance upon our understanding. I mean, that's a lie,
11 isn't it?

12 A. That is my error in writing position when I
13 meant to write opportunity.

14 MR. DROGIN: Okay. Great time for a
15 bathroom break.

16 THE WITNESS: Okay.

17 MS. HARWIN: Thank you.

18 THE VIDEOGRAPHER: We are off the video
19 record. The time is 2:07 p.m.

20 (Whereupon, a short break was taken.)

21 THE VIDEOGRAPHER: We're back on the
22 video record. It's 2:15 p.m.

23 Q. Ms. Robinson, why didn't you leave before April
24 to pursue this opportunity in London?

25 A. Um, I had spoken to Bob in January about

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2 continuing with Canal Productions.

3 Q. Right. But when things started to go south,
4 why didn't you just leave then to pursue your goal in
5 London?

6 A. Can I clarify, are you talking about February
7 March or are you talking about a different time period?

8 Q. Yeah, yeah. You had this deal with him in
9 January, he wasn't honoring it, why didn't you just
10 leave and go to London?

11 A. Because I had spoken to Bob and I had been
12 trying to reach him on multiple occasions to work things
13 out and to discuss -- discuss.

14 Q. Okay. I want to talk about what you call
15 targeting. This a term that you used. Was it your
16 belief that Bob knew as far back as October of 2018 that
17 Tiffany did not like you and wanted you gone?

18 A. I -- October 2018?

19 Q. Yes.

20 A. I don't -- I don't think that October would be
21 correct. I would probably say that -- December -- from
22 my knowledge, December 2018 that she was targeting based
23 on my gender.

24 MR. DROGIN: Let's go to 7209 at 23
25 minutes 55 seconds.

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2 (Whereupon, the recording was played at
3 this time as follows:

4 MS. CHAMBERS: I told him --

5 MS. ROBINSON: But you know what I
6 mean, I was put into the center of it. And Bob
7 knew in October that she didn't like me. Bob
8 knew in November she didn't like me, Bob knew
9 in December that she didn't like me and wanted
10 me gone. And yet, I still like --)

11 Q. Alright. So does that refresh your
12 recollection as to whether or not you believed that Bob
13 knew since October that Tiffany didn't like you and
14 wanted you gone?

15 A. I can't recall --

16 Q. That's fine, if you can't recall, you can't
17 recall.

18 A. Why I thought in October 2018 --

19 Q. That wasn't my question. See we're wasting
20 time. That wasn't my question. Tiffany was out for
21 you, wasn't she?

22 A. At the tail end of my employment I felt that
23 she was.

24 Q. Now you thought that Tiffany could not have
25 people around her who had Bob's ear; isn't that right?

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2 A. I can't recall. I recall it with Grace, that
3 Grace didn't want people that had Bob's ear.

4 Q. I'm not asking about Grace. Please, let's stay
5 to task. Did you believe that Tiffany could not have
6 people around her who had Bob's ear, yes or no, you
7 either believed it or you didn't, yes or no?

8 A. I believe women such as myself, I think it was
9 women around Bob who had Bob's ear, and that was me.
10 Targeting me based on my gender.

11 MR. DROGIN: Okay. Nice answer, move
12 to strike.

13 Q. Actually, you know what, let me ask it this
14 way, she was only targeting you?

15 A. She was only targeting me based on gender. I
16 don't know what happened after I left. But from my
17 knowledge, she was targeting me based on my gender and
18 --

19 Q. I got it. I got it. I got it. Now you told
20 Robin that you believed that Tiffany would have targeted
21 you even if you refused to take on the work at [REDACTED] that
22 she and Bob were giving you; isn't that right?

23 A. I can't recall. We had so many discussions.

24 Q. Alright. Tiffany targeted Robin, didn't she?

25 A. After my employment ended, yes, it seemed she

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2 had.

3 Q. So the answer to my question is, yes, Tiffany
4 targeted Robin?

5 A. Tiffany targeted Robin after I resigned.

6 Q. And Tiffany targeted Lulu, yes or no?

7 A. I don't know if I would characterize it as
8 targeting Lulu. Um, she um -- she didn't trust Lulu and
9 wanted her fired is what I was told.

10 Q. Now she targeted Michael Kaplan and wanted to
11 get rid of him too, didn't she?

12 A. I don't recall. I don't recall that.

13 Q. Alright. And she even targeted Michael Tasch,
14 didn't she?

15 A. I don't know if I would use the word targeted.

16 Q. But she wanted Michael Tasch out, right?

17 A. I can't recall what she wanted with Michael
18 Tasch, I know that they are -- I'll just leave it at
19 that.

20 Q. Tasch was someone who had Bob's ear, right?

21 A. I don't believe he had Bob's ear in the way
22 that she would target somebody. I believe it was based
23 on -- it was based on gender and it was based on, you
24 know, this perceived notion of me being close with Bob
25 which she constantly repeated and repeated.

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2 MR. DROGIN: Okay. And let's go back
3 to 7226 from 18:50 to 19:23. And let's hear
4 what you said that day. It starts with I
5 honestly, so this is going to be honest.

6 (Whereupon, the recording was played at
7 this time as follows:

8 MS. ROBINSON: Honestly the way that I
9 go -- and again, this is just a perspective,
10 you don't have to -- please don't think that
11 this is necessarily what it's going to be. But
12 the only way that I can see it is that she
13 cannot have people around Bob who have his ear,
14 for anything. Like, you just talking about Kap
15 and not getting rid of Kap right away and that
16 you want to work with Kap, when she finds out
17 about that, she's going to go fuck him --

18 MS. CHAMBERS: Right, right.

19 MS. ROBINSON: I want him gone. I want
20 him gone. He's lazy, he's dishonest, I want
21 him gone.)

22 MR. DROGIN: That's it.

23 MS. HARWIN: Can you provide the time
24 stamp.

25 MR. DROGIN: Yeah, 18:50 to 19:23.

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2 Q. Now when you were saying this, you didn't say
3 she wanted females gone, you said the only way that I
4 can see this is, she cannot have people around Bob who
5 have his ear. Did you hear yourself say that?

6 A. I did, but I --

7 Q. Yes or no. Did you hear yourself say that?

8 A. Yes, I heard myself say that but --

9 Q. Great. That's all I wanted to know. My only
10 question was, did you hear yourself say it. You heard
11 yourself say it.

12 Now then you talked about getting rid of Kap.
13 Did you hear yourself say that? Yes or no, if not we'll
14 play it again. I just want to know, did you hear
15 yourself say it?

16 A. This was a hypothetical I believe and it was
17 after I resigned. It was a conversation -- I need more
18 context of what the conversation was -- this, again what
19 she would do --

20 Q. Stop. My only question is whether you heard
21 yourself say it?

22 MS. HARWIN: Counsel the tape speaks
23 for itself.

24 MR. DROGIN: No, it doesn't. It
25 doesn't. There's a Witness here and I'm asking

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2 the Witness if she heard what she said.

3 A. I didn't hear what I said before or after the
4 context of it, but I did hear myself say that.

5 Q. Thank you. Now did you feel that Tiffany also
6 wanted Michael Tasch out?

7 A. I believe that there was a time in which --

8 Q. Yes or no.

9 A. Can you clarify when you mean out.

10 Q. Fired.

11 A. I can't recall if she wanted him fired.

12 MR. DROGIN: 7174 five minutes 15
13 seconds to five minutes 45 seconds.

14 (Whereupon, the recording was played at
15 this time as follows:

16 MS. ROBINSON: Michael Tasch called
17 yesterday and he basically is out. He
18 basically -- she cut him out, she wants him
19 gone, basically --

20 MR. KAPLAN: This was last week, when
21 he showed up to the office (sic)?

22 MS. ROBINSON: Yeah, it was basically,
23 the way that the John Hacket said to me, he
24 said Tiffany has a noose around his neck right
25 now.

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2 MR. KAPLAN: Right. Didn't she want
3 Tasch to get back to her on something (sic).

4 MS. ROBINSON: Yeah, and then --)

5 Q. Alright. Did you hear the audio clip?

6 A. Yes.

7 Q. Does that refresh your recollection as to
8 whether or not you believed that Tiffany wanted Michael
9 Tasch out?

10 A. I don't know the context of out was out of the
11 apartment or out of the situation, that -- I did hear
12 him say that, but again, I don't know the full context
13 or when that was happening or when that happened that
14 day.

15 Q. So we've got all the tapes but when you
16 mentioned John Hacket told him that Tasch had a noose
17 around his neck --

18 A. Was it -- I don't recall, was it John Hacket
19 who -- is that what the audio said?

20 MR. DROGIN: Let's try another one,
21 7224 at 13:55 to 14:15.

22 (Whereupon, the recording was played at
23 this time as follows:

24 MS. ROBINSON: --belongs in Bellevue.
25 Michael Tasch is also going to be gone. He's

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2 probably safe right now because he's giving her
3 the information that she wants. But
4 eventually --

5 MS. CHAMBERS: Bob said for me to call
6 Michael Tasch, I guess, about money now and
7 stuff, which I said no. I said he is to all me
8 back, I said, he's very nice, but he doesn't --

9 MR. DROGIN: Okay. 7224 15:40 to
10 16:30.

11 (Whereupon, the recording was played at
12 this time as follows:

13 MS. ROBINSON: Tasch will be next
14 because all of this stuff, you know, with Kap,
15 and the petty cash and everything, Michael
16 Tasch is the one that was getting all those
17 sheets.

18 MS. CHAMBERS: Yeah, I believe you.
19 You've been right so far. I think the thing
20 that saved me today is I said, I quit, number
21 one. And then number two, I said I can't do
22 this forever.

23 MS. ROBINSON: And by the way, it's not
24 in Tiffany or Bob's -- it's not in their
25 personality to want you to quit, they want to

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2 fire you, they want to get rid of you.

3 MS. CHAMBERS: Okay, wow.

4 MS. ROBINSON: As you told me, Bob does
5 not like to be left.

6 MS. CHAMBERS: Yeah, he doesn't.

7 MS. ROBINSON: He doesn't want to be
8 left by you, 30 years. He didn't want to be
9 left by me. He wanted, you know -- and Tiffany
10 wanted to destroy me. And in the end, you know
11 it's --

12 MS. CHAMBERS: You're right.)

13 MR. DROGIN: You could stop it.

14 Q. So would you agree with me that back when you
15 made these recording, you believed that Tiffany wanted
16 to Michael Tasch fired out, removed, gone, yes or no?

17 A. I wouldn't agree with you with that. I would
18 say that --

19 Q. Okay. What about Michael Kaplan?

20 A. That was a perspective of whatever Robin and I
21 were discussing. I will say it's correct that, you
22 know, you can see that Tiffany was targeting Robin based
23 on gender and Bob was retaliatory in not wanting
24 people -- women, specifically myself or Robin to leave
25 him. It was well known, that was, again, based on

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2 gender.

3 MR. DROGIN: Just so we're clear, every
4 time you say that, I move to strike. You keep
5 looking to redirect to get those words in, it's
6 not going to work, so you don't have --

7 MS. HARWIN: Counsel, she's entitled to
8 provide her answer to your question.

9 MR. DROGIN: She's wasting my time at
10 my deposition by polluting my transcript with
11 conclusory statements. And I'm happy to make
12 the record and document it. Saying gender
13 doesn't make it so. That's why we're listening
14 to these recordings. Can you go to BB, please.
15 Let me know when you have it.

16 THE WITNESS: Yes, can I read it?

17 (Whereupon, a document Bate Stamped
18 Robinson 00007976 was marked as Exhibit BB, for
19 identification, as of this date.)

20 MS. HARWIN: Is BB in the chat?

21 MR. DROGIN: BB is in the chat.

22 Q. You don't really have to read it. I just have
23 a single question about it. Let me know when you're
24 ready about the question?

25 A. Okay. Let me read it so I can answer your

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2 question.

3 Q. Well, you don't have to read it to answer my
4 question. You just have to look at what it is. Let me
5 know when you're ready. Do you recognize the phone
6 number [REDACTED]?

7 A. I believe that is -- I don't want to guess.

8 Q. What do you believe?

9 A. Tiffany Chen.

10 Q. Okay. I think you're right. Look at the
11 bottom right corner. Do you see it says Robinson 7976?

12 A. Yes.

13 Q. How did you get a text between Tiffany Chen and
14 Robert De Niro?

15 A. As I told you in my last deposition, I had a
16 copy of Bob's phone. This was a text message that I
17 came across while doing the work on the divorce for Bob.

18 Q. And when did you start reviewing documents on
19 his phone and when did you stop?

20 A. I can't recall the specific dates other than,
21 say, the range was probably end of January, February.

22 Q. So during your employment, you came across this
23 text; is that right?

24 A. Yes.

25 Q. And you came across it in connection with

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2 working with him and his attorney on his divorce; is
3 that right?

4 A. Yes.

5 Q. And this is a document that you retained after
6 you resigned your employment?

7 A. Can you repeat that question.

8 Q. Is this a document that you retained after you
9 resigned your employment?

10 A. I don't know.

11 Q. Well, did you have it after you resigned your
12 employment?

13 A. I had it during my employment. It was during
14 my employment. Actually no, let me correct that. I had
15 seen a copy of this during my employment.

16 Q. Okay. And after you resigned, did you continue
17 to have a copy of it, either in hard or electronic
18 format?

19 A. No, I had seen it. I recall seeing it, like,
20 when I was doing work on the divorce for Bob's project.

21 Q. Right. Let's not talk past each other. The
22 bottom right-hand corner reflects that you produced this
23 document to us. My question is, how did you come to
24 have it in your physical possession such that you could
25 turn it over to us?

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2 A. I had -- I returned a copy of Bob's -- a clone
3 of Bob's phone to you.

4 Q. How did you come to have a copy of this text
5 after your employment?

6 A. I don't know where this copy came from. I
7 don't know where this copy came from.

8 Q. So this is a text sent by Tiffany to Bob that
9 you produced after this litigation began, correct?

10 A. It was produced, yes. I don't know --

11 Q. No question pending. Now at the end of March
12 of 2019, Bob was ignoring you; isn't that true?

13 A. Yes, I wouldn't clarify it as ignoring me, he
14 wasn't speaking to me um -- he wasn't speaking to me.

15 Q. And in fact he wasn't speaking to other Canal
16 employees in the office; isn't that true?

17 A. He wasn't speaking to them?

18 Q. Yes, I'll rephrase it in the positive. Was he
19 speaking with the girls in the office less frequently as
20 well?

21 A. No, I don't believe that would be correct.

22 MR. DROGIN: Okay 7175 at one hour 31
23 minutes and 15 seconds.

24 MR. BENNETT: I'm going to start at 10
25 because I think it was chopped off.

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2 (Whereupon, the recording was played at
3 this time as follows.

4 MS. CHAMBERS: He's avoiding, like a
5 you know what. Yeah, he is.

6 MS. ROBINSON: I don't think that he's
7 talking to the girls as much either. I think
8 they get little bits and pieces here and there
9 at this time. So I think it's also --

10 MS. CHAMBERS: Yeah, it's not just
11 you.)

12 MR. DROGIN: That's fine.

13 Q. So does that refresh your recollection as to
14 whether it was your perception that he was speaking with
15 the girls in the office less also?

16 A. On that day --

17 MS. HARWIN: Can you clarify the
18 timeframe for your question, Counsel?

19 MR. DROGIN: 1:31:10 to 20.

20 MS. HARWIN: No, I'm sorry, the
21 contents of your question, over what period of
22 time are you asking?

23 MR. DROGIN: At the time the recording
24 was made.

25 THE WITNESS: On that day or in that

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2 moment. But in general the way that he was --

3 Q. That's all I needed to know. I don't need to
4 know in general. At the end of March you thought that
5 Bob might want to end your employment; is that true?

6 A. Can you repeat your question. At the end of --

7 Q. Around the end of March you thought that Bob
8 might want to end your employment?

9 A. I don't recall -- I don't recall like -- I
10 don't recall when or if.

11 Q. Now around the end of March, you -- I think you
12 testified you were having some sort of breakdown,
13 correct?

14 A. End of January, February, March, yes.

15 Q. Alright. And at one point you and Robin were
16 on the phone and you were discussing concocting a scheme
17 in order to get time off by making up a fake story about
18 your mother having a medical crisis that required you to
19 be away. Do you recall that?

20 A. I don't recall that.

21 MR. DROGIN: Alright. So it's 7168 at
22 7 minutes 32 seconds to 8 minutes and 10
23 seconds.

24 (Whereupon, the recording was played at
25 this time as follows:

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2 MS. ROBINSON: So I think that we have
3 a -- I think that we have a plan there. So I
4 think that um -- I think that this, I do think
5 that this scenario, at this moment, if I'm in
6 good standing with Bob, which I know that I am
7 today, tomorrow, Wednesday pulling the rug out
8 and making him wonder, holy shit, four days
9 without her, I'm stuck with this fucking nut
10 job, oh my God, she can't do this, what's going
11 on, where is she?

12 MS. CHAMBERS: Yeah, it's time if he
13 realizes what that life looks like (sic).

14 MS. ROBINSON: And that's what I want
15 him to realize. Because I can't keep getting
16 beaten up by Tiffany. Her fucking e-mails to
17 me are --)

18 MR. DROGIN: That's fine, let's stop.

19 Q. You heard that clip Chase?

20 A. Yes.

21 Q. You're trying to make him jealous, weren't you?

22 A. I think Robin --

23 Q. Yes or no. You were?

24 A. I wouldn't characterize it in that way.

25 Q. Okay. You were trying to create a scenario

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2 when you were out of sight, out of mind and he would
3 realize how much he needed you. Isn't that what you
4 were trying to do?

5 A. I wouldn't characterize it in that way.

6 Q. Then just say no. If I'm wrong, I'm wrong.

7 No?

8 A. Again, I wouldn't be able to answer that
9 without --

10 Q. Weren't you looking to get his attention
11 because he had been ignoring you?

12 A. From that conversation I think Robin and I had
13 all different sort of discussions. We spoke about, you
14 know, a range of different things, you know, I --

15 MR. DROGIN: Got it, okay. Now let's
16 take a look at CC, Exhibit CC.

17 (Whereupon, a document Bate Stamped
18 Robinson 00001347-49 was marked as Exhibit CC,
19 for identification, as of this date.)

20 Q. So this is a string of e-mails beginning on
21 March 27th. And if you go to the one on page two,
22 towards the middle of the page, Tiffany writes, it's
23 sometimes hard to fully understand your hierarchy of
24 responsibility of who does what for who and when. Do
25 you see that?

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2 A. Yes.

3 Q. And this was an e-mail that you were actually
4 copied on, right?

5 A. This e-mail was sent to me.

6 Q. Right. A chain that you are on? Now at the --

7 A. She sent it to me.

8 Q. Right. You're in copy on this e-mail, fair
9 enough?

10 A. It was sent to me.

11 Q. Okay. Now Bob was skiing out West at the time;
12 isn't that true?

13 A. I can't recall.

14 Q. Alright. And you responded to her at 11:47
15 a.m. Do you see that?

16 A. Yes.

17 Q. And then she responded to you at noon with the
18 language that I've just read from, I'm sorry, I haven't
19 read from it yet. The last sentence says, I don't know
20 why I have to go through explaining this logic to you.
21 It is clear there are things you do not and will not do.
22 Did I read that right?

23 A. It is clear there are things you do not and
24 will not do. Yes.

25 Q. And that really angered you, didn't it?

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2 A. I think the whole e-mail and communication from
3 Tiffany -- I wouldn't characterize it as angry. It was
4 demeaning and horrible and it's not -- from my employer
5 it was very upsetting and --

6 Q. I'll stick with upsetting and we can just
7 assume it was all based on your gender too, okay? We
8 can do that because I know that you want to get that in.
9 So I'll put it in there that that's your assumption.

10 Now you replied to her at 12:38. Do you see
11 that?

12 A. That, I forwarded it to Bob. Not replying to
13 her. I forwarded it to Bob. I think you're incorrect
14 with that.

15 Q. Actually you e-mailed it to Bob taking her off
16 copy and you e-mailed it to him at his Mac address
17 whereas she had sent it to him at iCloud. Do you see
18 that?

19 A. iCloud and Mac are the same -- iCloud, Mac,
20 they are all the same it just depends on how it's
21 labelled on your computer.

22 Q. Okay. So you used the Mac address. And in
23 this e-mail, you told him among other things that it
24 wasn't working, right?

25 It has been pretty obvious for a while that

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2 there is an issue with me working for you. And I've
3 tried really hard without bothering you to get out of
4 the middle and out of your home and get back to my job,
5 it's not working", correct?

6 A. The issue being working in the home with
7 Tiffany. And Tiffany was having the issue of me working
8 and that was not about throwing in the towel, I just
9 want to talk to him and make sure everything runs
10 smoothly. I'm asking for his guidance on this. It's
11 not about throwing in the towel or quitting.

12 Q. I understand. And you say here, I hope you and
13 Helen are having fun skiing. Do you see that?

14 A. Yes.

15 Q. Does that refresh your recollection as to
16 whether or not Bob was skiing on March 27, 2019?

17 A. It seems as if he was, yes.

18 Q. Okay. Now you didn't receive a response to
19 that e-mail; isn't that true?

20 A. I don't recall.

21 Q. So on April 2nd you sent him an e-mail which I
22 think we referred to as the out of sight out of mind
23 e-mail. Do you recall that?

24 A. I don't know what date that was sent. But
25 there was an e-mail sent that did state out of sight out

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2 of mind as a possibility to help with Tiffany targeting
3 me and my gender as Grace did in the beginning. It was
4 out of sight, out of mind, what Bob utilized to --

5 MR. DROGIN: Just a simple question.

6 Can we -- Britt, I don't know if that's the
7 next document. It's Robinson 8921 or do we
8 have it tagged as something else.

9 MS. LAZZARO: It's not the next, but
10 give me a second.

11 MR. DROGIN: Yeah, I think we marked it
12 later. It can be DD. Let's go off the record
13 just so we can not waste time. And can you
14 give us a count please of how many minutes
15 we're in?

16 THE VIDEOGRAPHER: Yeah, just one
17 moment. We're off the record. It's 2:45 p.m.

18 (Whereupon, a discussion was held off the
19 record.)

20 THE VIDEOGRAPHER: We are back on the
21 video record. It is 2:53 p.m.

22 (Whereupon, a document Bate Stamped
23 Robinson 8921 was marked as Exhibit TT, for
24 identification, as of this date.)

25 Q. Okay. So Ms. Robinson I've now put up in front

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2 of you what we've marked as Exhibit TT here. One page
3 string of e-mails. Starting at the bottom, this was an
4 e-mail you sent to Bob and you say in the second
5 paragraph, "I know that you didn't respond to my e-mail,
6 but since that e-mail on 3/27, I've had some time to
7 think about everything and I didn't want to bother you
8 while you were away with the kids." Do you see that?

9 A. Yes.

10 Q. Does that refresh your recollection as to
11 whether or not you received a response to the March 27th
12 e-mail that you sent that was Exhibit CC?

13 A. Yes, it does.

14 Q. And you in fact did not receive a response?

15 A. Not to that specific e-mail, no.

16 Q. Okay. And in this e-mail, the second to last
17 paragraph, you say, you know how much I love this job
18 and even when I was based away from New York, I was
19 always if you needed me, I want to go back to that
20 arrangement. Do you see that?

21 A. Yes.

22 Q. Were you being honest when you said that you
23 loved the job?

24 A. At times I did love the job.

25 Q. Okay. In fact weren't you really looking here

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2 to get away from Tiffany?

3 A. Let me just read it because I just want to
4 answer your question correctly. To answer your
5 question, I believe that was part of it, yes.

6 Q. You were proposing that you had worked
7 somewhere other than New York, correct?

8 A. Be out of sight out of mind, yes.

9 Q. But particularly you were talking about leaving
10 New York; is that right?

11 A. That is what the e-mail says, based away from
12 New York.

13 Q. Okay. How frequently around this time, and
14 I'll confine that to February, March, April of 2019 were
15 you actually in Tiffany's presence?

16 A. In Tiffany's presence I can't recall how many
17 times.

18 Q. But it was infrequent, wasn't it?

19 A. At times several times a week at the apartment.
20 I was also in contact with her with e-mails um --

21 Q. But I'm asking about physical presence.

22 A. I -- there were times that I was there multiple
23 times a week at the [REDACTED] apartment.

24 Q. Where she was there?

25 A. Yes.

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2 Q. Did you speak with her by phone as well?

3 A. Yes.

4 Q. Now at the time that you sent this e-mail on
5 April 2nd, you had a suspicion that she was reading his
6 e-mails; isn't that true?

7 A. I believe it had crossed my mind that there was
8 a possibility, but I didn't have any evidence or know.

9 Q. In fact, you told Robin that you felt that some
10 of the e-mails from Bob were actually written by
11 Tiffany, correct?

12 A. I believe there was a discussion on something
13 like that in relation to -- yes, there was a
14 conversation I believe in reference to --

15 Q. Yes is all I needed. Did it occur to you that
16 Bob might share this e-mail with Tiffany?

17 A. I don't think that crossed my mind that he
18 would share -- he was my employer, so -- I didn't think
19 that he would.

20 (Whereupon, a document Bate Stamped
21 Canal 34641-4 was marked as Exhibit DD, for
22 identification, as of this date.)

23 Q. Alright. Can you take a look at Exhibit DD.
24 Do you see Exhibit DD, the end of the first page and on
25 to the second page. That is your e-mail to Bob of 1/29.

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2 Do you see that?

3 A. Yes.

4 Q. Okay. And if you scroll to the top, you see
5 there's an e-mail from Bob -- I'm sorry, from Tiffany to
6 Bob at 1:59 p.m.?

7 A. Yes.

8 Q. It says, "this shit really pisses me off. That
9 is so manipulative and nasty that she has the gall to
10 place blame on me for her lies. This bitch needs to get
11 put in her fucking place."

12 Do you see that?

13 A. Yes.

14 Q. Now that's a response to her 1/29 e-mail that
15 you sent to Bob. Do you see that?

16 A. Yes.

17 Q. Now that comment, "this bitch needs to get put
18 in her fucking place," that really upset you, didn't it?

19 A. I have never seen this e-mail until this
20 moment.

21 MR. DROGIN: Wow, can you read that
22 question and answer back.

23 (Whereupon, the record was read by the
24 reporter.)

25 MR. DROGIN: 7175 at 26 minutes and 39

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2 seconds to 27 minutes and 8 seconds.

3 (Whereupon, the recording was played at
4 this time as follows:

5 MS. ROBINSON: Well, look what she said
6 in that text, put her in her place. Put her in
7 her place. Her whole e-mail is like --

8 MS. CHAMBERS: (Inaudible).

9 MS. ROBINSON: Put here in her place is
10 what she said. And then in her e-mail it was
11 like, you need to write a guide on what you do
12 and what you don't do. Like, I mean, I don't
13 do any of this stuff. This is all a favor for
14 Bob. You know this is all -- this is all --)

15 MR. DROGIN: Let's stop. That's fine.

16 Q. Now two things there, you said, put her in her
17 place, put her in her place, which e-mail is that from?

18 A. You're incorrect from the audio. It said from
19 her text message.

20 Q. Which text message are we talking about?

21 A. Obviously from the audio, there was a text
22 message in some way to put her in her place. I can't
23 recall specifically which text message. I believe it
24 was one of the ones that I found during the divorce
25 work. But in terms of this e-mail, I have never seen

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2 this e-mail until this point. But again, I'm talking in
3 the audio about the March 27th e-mail and her asking me
4 to put a guide together and then I'm talking about a
5 text message where she said put me in my place or
6 something along the lines of that. So it's not in
7 reference to this e-mail.

8 Q. Okay. Alright. Now who is Rachel Humphries?

9 A. Rachel Humphries was an assistant designer that
10 helped Bob with the [REDACTED] apartment.

11 MR. DROGIN: Okay. And you had --
12 let's go to EE.

13 (Whereupon, a document Bate Stamped
14 Robinson 6484 was marked as Exhibit EE, for
15 identification, as of this date.)

16 Q. Let me know when you're there.

17 A. Yes.

18 Q. If you look, there's a text where you tell her
19 that you can't just walk out.

20 A. Yes, I see that.

21 Q. Okay. So as of April 4th had you made a
22 decision to resign?

23 A. No.

24 MR. DROGIN: Let's take a look at FF.

25 Let me know when you're there.

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2 A. I'm reading it.

3 (Whereupon, a document Bate Stamped
4 Robinson 1641 was marked as Exhibit FF, for
5 identification, as of this date.)

6 Q. The bottom e-mail is your resignation e-mail?

7 A. Yes.

8 Q. When you woke up that morning, had you decided
9 you were going to resign that day?

10 A. No.

11 Q. Did something happen during the day that caused
12 you to resign that evening?

13 A. Yes.

14 Q. What happened?

15 A. I had spoken to Robin Chambers and also had --
16 I had spoken to Lulu White. I had become aware of
17 Tiffany e-mailing the office and in -- in speaking to
18 Michael Kaplan, I think he put it in the terms of, like,
19 cutting me out, if I recall correctly. She had been
20 e-mailing the office and telling them not to --
21 basically taking my job away and telling them not to
22 respond or let me know that she was doing this.

23 Q. How did you come to see those e-mails?

24 A. I logged into Lulu White's e-mail after I had
25 spoken to her and came across them.

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2 Q. Okay. So you gave no notice, correct?

3 A. Um --

4 Q. Correct?

5 A. I'm just --

6 MS. HARWIN: Talking about on April
7 6th?

8 Q. Let me ask it another way. Your resignation
9 was effective; isn't that right?

10 A. As I had written effective immediately.

11 Q. And the resignation was made known simply by
12 this e-mail?

13 A. That was the resignation e-mail, yes.

14 Q. And then you got a response at 8:30. Do you
15 see that?

16 A. Yes.

17 Q. Were you surprised by his response?

18 A. No. Bob tends to ignore items that he doesn't
19 want to deal with. So the answer is no.

20 Q. Now you then responded back, replied back 8:41
21 and you wrote in the second line, "Bob, please read the
22 e-mail below from me, I have decided to no longer work
23 for you, please respect my wishes."

24 Do you see that?

25 A. Yes.

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2 Q. Are you telling him that you did not want to be
3 contacted by him any further?

4 A. That I no longer worked for him.

5 Q. And therefore you didn't want to do anymore
6 work; is that right?

7 A. Well, I decided to no longer work for him or
8 for Canal.

9 Q. You kind of left him in the lurch so to speak,
10 right?

11 A. I wouldn't characterize it that way. I was at
12 a breaking point and there was no way.

13 Q. Okay. Were you expecting that he was going to
14 come after you and try to work it out with you, smooth
15 things over?

16 A. No, I think what was going through my head --

17 MR. DROGIN: I don't care about your
18 head. I don't care about your head. I just
19 want an answer to my question.

20 MS. HARWIN: You asked her a question
21 about what she thought.

22 MR. DROGIN: Can we hear the question
23 back.

24 (Whereupon, the record was read by the
25 reporter.)

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2 Q. Yes or no.

3 A. I don't know what he was going to do or what I
4 expected him to do.

5 Q. Well, in 2018, when you resigned, there were
6 further discussions and that resulted in the January
7 2019 agreement; isn't that correct?

8 A. At that time, yes.

9 Q. So did you have an expectation that he might
10 reach out to you try to sit down and work things out?

11 A. I don't recall thinking that in my mind,
12 especially with what had transpired.

13 Q. Isn't that what you wanted though, you wanted
14 him to come back to you and smooth things over?

15 A. I can't recall ever feeling that way.

16 Q. So at the time that you resigned, you actually
17 believed that you were going to be fired; is that right?

18 A. No.

19 Q. Well, then why did you resign?

20 A. Because I hit a breaking point. I couldn't
21 continue working. Everything seemed to always continue
22 in the same pattern with him. I was not eating, I was
23 not sleeping. I was in extreme emotional distress, I
24 just couldn't continue anymore.

25 Q. Okay. But the last straw were these e-mails

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2 that you saw?

3 A. So the last straw was the e-mails, the
4 discussion with Robin, um --

5 Q. Let's just back up a second. You woke up that
6 morning and you had not intended to resign. Did I hear
7 you correctly?

8 A. Yes.

9 Q. And at some point during the day, you viewed
10 some e-mails that you described a few moments ago?

11 A. Yes.

12 Q. My question is, was that the last straw, seeing
13 those e-mails?

14 A. I believe it was one of the last straws.

15 Q. How can you have more than one last straw? It
16 was the last straw. What was the last straw, not one of
17 the last straws, the last straw. That's it, I'm done,
18 I'm out of here.

19 A. I go back and say it's one of the last straws,
20 I think the combination of everything was the final
21 straw.

22 Q. Okay. So you resigned because you were
23 stressed out; is that fair?

24 A. I wouldn't characterize it that way.

25 MR. DROGIN: Alright. Let's go to the

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2 April 6th e-mails which we've consolidated as
3 Exhibit GG. I just want to make sure I have
4 it. There's six pages here.

5 (Whereupon, a document Bate Stamped
6 Robinson 1383 was marked as Exhibit GG, for
7 identification, as of this date.)

8 Q. And my question is, are these the e-mail that
9 you've just been testifying about that you reviewed on
10 April 6, 2019?

11 A. Let me look through them.

12 Q. Please.

13 MR. DROGIN: Why don't we take a
14 two-minute break so you can do that and we
15 won't waste time on the record.

16 THE VIDEOGRAPHER: Okay. We are off
17 video record. The time is 3:11 p.m.

18 (Whereupon, a short break was taken at
19 this time.)

20 THE VIDEOGRAPHER: We're back on the
21 video record. It's 3:12 p.m.

22 Q. So we are at GG, correct?

23 A. Yes.

24 Q. Alright. So my question to you was whether
25 these are the e-mails that you've just been testifying

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2 about?

3 A. Yes.

4 Q. And if we go to the first one, I'll put it in
5 here, this e-mail suggests that you are being removed
6 from [REDACTED] and that others are taking over; is that a
7 fair characterization of it?

8 A. The first one?

9 Q. Yes.

10 A. In part, yes.

11 Q. So she says in the fourth paragraph, "Chase is
12 no longer involved with anything regarding the townhouse
13 or the twins." Do you see that?

14 A. Yes.

15 Q. Isn't that good news? Isn't that what you
16 wanted?

17 A. This is somebody who --

18 Q. Yes or no. Isn't that what you wanted, yes or
19 no?

20 A. I did not. I did not and had objected to
21 working on the townhouse.

22 Q. And she is saying, Chase is no longer involved
23 with anything regarding the townhouse or the twins. My
24 question is, isn't that what you wanted to?

25 A. Yes, but this is not at the direction of my

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2 employer. This is my employer's girlfriend directing
3 the office to not tell me, you know, what's going on and
4 to cut me out of work that my employer was giving.

5 Q. Hold on. Hold on. It's a simple sentence.
6 What does it matter who said it? Isn't this what you
7 wanted? You wanted out of the townhouse. Isn't that
8 what you wanted, yes or no?

9 A. I didn't want to work on the townhouse. I
10 didn't want to work on the design or that.

11 Q. Okay. As I read this, this is your dream come
12 true, she says, Chase is no longer involved with
13 anything regarding the townhouse or the twins. You are
14 not to discuss anything with her that you discuss with
15 us. Any e-mails between us are not to be shared with
16 Chase. Did I read that right?

17 A. I think you read that incorrectly.

18 Q. Did I miss a word? Did I add a word? What did
19 I do wrong?

20 A. I would say that I think that you are reading
21 it incorrectly on what the contents mean.

22 Q. Okay. But again, this wasn't an e-mail that
23 was sent to you. So you're actually surmising as well
24 what it means; isn't that fair?

25 A. With the addition of the other e-mails, I don't

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2 believe I am incorrect on sort of my thought on what
3 these e-mails are about, cutting out my job, cutting me
4 out from the office --

5 Q. Well, wait a minute. Where in this e-mail does
6 it say, you're cut out from the office?

7 A. Well, I mean saying with the addition of the
8 other e-mails altogether. This one in itself is any
9 e-mails between us are not to be shared with Chase is
10 just not -- you know, is -- it's just not appropriate.

11 Q. So here's the question, I read that since it's
12 in the same paragraph as removing you from the
13 townhouse, I read that saying, e-mails regarding the
14 townhouse were not to be shared with Chase, you read it
15 differently; is that right?

16 A. I read it differently.

17 Q. That's all. That's all I needed to.

18 A. No, it's not in the --

19 Q. That's all I needed to know if you read it
20 differently. Now in the next page this is an e-mail to
21 Lulu, right?

22 A. Yes.

23 Q. And she says to Lulu, I would like to remind
24 you that we all work for Bob and you are not Chase's
25 assistant. Do you see that?

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2 A. Yes.

3 Q. Is there a problem with that?

4 A. Yes. I'm being demoted and demeaned in this.

5 Um --

6 Q. Show me where you're being demoted?

7 A. I'm having somebody who was intended to be my
8 assistant, I was VP of production and finance being
9 taken away by my employer's girlfriend and you know --
10 and having these messages sent where I am not included
11 on them. It is -- it is -- it is cutting me out of --

12 MR. DROGIN: Okay. Spoiler alert,
13 every time you refer to Lulu as your assistant,
14 this side of the screen loves it. Because we
15 agree that she was your assistant. That's one
16 of the reasons that you're an exempt employee,
17 but we'll come back to that later.

18 Hey, I'm not done yet. Cut it out.
19 Don't bark now or just take a break. Don't do
20 that to me.

21 MS. HARWIN: Let the record reflect
22 that the last part of that discussion was
23 directed not to the parties on screen, but to a
24 dog off screen.

25 MR. DROGIN: Thank you so much, that

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2 would have been ridiculous in the transcript.

3 Ally, I owe you one for that one. That would

4 have been so bizarre.

5 Q. Okay. Now there's nothing in this second

6 e-mail about you actually being demoted, right --

7 there's nothing in here that -- I'm asking two questions

8 at once. Let me just back up.

9 Nothing in this e-mail changes your duties and

10 responsibilities; isn't that correct?

11 A. Let me read it.

12 Q. Sure.

13 A. I disagree with you. There are items that are

14 from what her actual job responsibilities have been, she

15 is now working under the guidance of Gillian and

16 Sabrina. I am being cut out on not being -- this is not

17 being discussed with me and again --

18 Q. Sorry, where in this e-mail are your duties and

19 responsibilities being changed?

20 A. She is being asked to inform Gillian of what

21 her job responsibilities have been and that she now

22 works under the guidance of both Gillian and Sabrina,

23 it's cutting me out of this. This is not an e-mail in

24 any discussion that Bob and I discussed. It is -- I'm

25 not CC'd on it, it is cutting me out.

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2 Q. So in this e-mail that you obtained which you
3 were not CC'd on it, there's actually nothing there that
4 says your job is changing in this particular e-mail;
5 isn't that right?

6 A. I would sort of disagree with you in the way
7 that it was composed. That's it's being sent by
8 somebody who is not an employee of Canal who is taking
9 over a managing an office and telling people what to do
10 with Bob CC'd. So what it means and the contents of it
11 is --

12 Q. So the answer is you disagree with me?

13 A. Yes.

14 Q. Alright. And let's take a -- the next two
15 pages, 1340 and 41, this is just a continuation of that
16 thread, correct?

17 A. It's a continuation of their discussion.

18 Q. And then the last two pages, it's separate a
19 e-mail, correct? This went to Sabrina rather than Lulu,
20 right?

21 A. Uh --

22 Q. Tiffany sends an e-mail at 7:10 a.m., there's a
23 response at 11:41 a.m. and then there's a reply at 11:43
24 a.m., right?

25 A. Yes.

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2 Q. And at 1:00 p.m. and 1:01 p.m., you print these
3 e-mails?

4 A. I believe that's correct.

5 Q. And roughly 6 o'clock that night you resign?

6 A. I believe that -- is there an e-mail that is
7 missing from what --

8 Q. I don't know what else did you steal? This is
9 all you produced. Anyway --

10 MS. HARWIN: Counsel, the rhetoric is
11 inappropriate.

12 MR. DROGIN: You're right. I didn't
13 mean to imply that you stole it. Unauthorized
14 access is probably a better way to do it.

15 Q. But had you ever -- other than this time, had
16 you ever accessed other employee's e-mails to see what
17 was being said?

18 A. I had accessed when I needed -- when employees
19 had left when I needed to print out receipts or get
20 information for Bob on specific things, but --

21 Q. So sequentially Lulu spoke to you that day and
22 told you in substance what Tiffany had said in this
23 e-mail; is that right?

24 A. No, the conversation with her, there was
25 something that was a red flag on the way that she was

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2 sort of discussing stuff that things had been discussed
3 behind my back and um --

4 Q. So the answer to my question is no?

5 A. Sorry I --

6 Q. Did you have a conversation with Lulu that
7 prompted you to check her e-mail?

8 A. Yes.

9 Q. And what did she tell you that prompted you to
10 check her e-mail?

11 A. I don't think it is exactly what she told me.
12 It was the conversation I was having with her. There
13 was sort of a red flag or a distance -- I can't recall
14 specifically, I just had this gut feeling that there was
15 something going on with Lulu and -- yeah.

16 MR. DROGIN: Okay. Let's go to HH.

17 (Whereupon, a document Bate Stamped
18 Canal 44560 was marked as Exhibit HH, for
19 identification, as of this date.)

20 Q. And you told Bob on April 6th you don't work
21 for him anymore?

22 A. Yes.

23 Q. And on April 8th Michael Kaplan sends you this
24 e-mail asking if you mind sending a password, Canal
25 administrative password. Do you see that?

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2 A. Yes.

3 Q. So when I asked you before about who was the
4 administrator. Was it your understanding that Michael
5 already had that password?

6 A. To clarify, the Canal admin password is not the
7 overall e-mails, with all the employees, the Canal
8 administrator was the password to the Canal computer and
9 the overall, I believe it was like an iCloud account
10 that all the computers were attached to. But Michael
11 Kaplan had that password and he had been given it and
12 used it on many occasions. This was not somebody who
13 kept things organized.

14 Q. Okay. And in the second e-mail that's here,
15 that's regarding American Airlines?

16 A. Yes.

17 Q. And it says in part, the one in context is hold
18 and there's a bunch of security questions. I don't know
19 if those are Bob's answers or yours. Do you see that?

20 A. Yes.

21 Q. Did you have a master list of passwords that
22 you kept at Canal?

23 A. Um, there was one with, like, some passwords --
24 the answer is yes, some. Some of them were kept on an
25 Excel document. Others were, to clarify, kept in the

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2 Canal contacts. And some were, each individual employee
3 had passwords to different websites or accounts or
4 things like that.

5 Q. Now after you resigned you told Tom Harvey that
6 there were a lot of open items that needed to be tended
7 to; is that correct?

8 A. We had discussed --

9 Q. Yes or no?

10 A. I can't recall if it was me or Tom saying that
11 there open items. But I assumed there would be an
12 orderly transition need.

13 Q. What do you mean by orderly transition?

14 A. A transition, as, you know, as Tom had e-mailed
15 Bob about a transition and making sure that nothing fell
16 under the cracks and making sure that everything was
17 passed on, you know, whatever outstanding work or what
18 needed to be done, that was the e-mail in my
19 resignation, Bob had written that he would be let know
20 what is needed from you. There's certain work that
21 needs to be done by you and only you, you will be let
22 know. So I was waiting for, you know, what was needed
23 for me in this transition. I had been in touch with Tom
24 Harvey about it.

25 Q. There were production issues that were open?

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2 A. Um --

3 Q. Yes or no or you don't remember?

4 A. There were items related to production.

5 Q. Were there open financial items?

6 A. I mean, there were always ongoing bill paying
7 items like that.

8 Q. Were there insurance?

9 A. Can you clarify insurance.

10 Q. Sure. Did you put together a document in the
11 days after you resigned that you and Robin referred to
12 as "the bible"?

13 A. The bible. I can't recall discussing anything
14 called the bible. But there was a document that I was
15 working on, to clarify, of all the outstanding things or
16 things that I thought that Bob should think about or
17 that we had discussed. It sort of tried to incorporate
18 everything that we had done or that we had discussed
19 that should be done or just, you know trying to put as
20 much information and put it all together for them.

21 Q. Now you didn't have to do that, right? You
22 could have refused?

23 A. I could have, but that's not the type of person
24 or ex-employee I was.

25 Q. You could have resigned, given him notice and

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2 said, I'm done, I'm going to put together this stuff to
3 aid with transition, but that's not what you chose to
4 do, right?

5 A. I'm sorry, can you repeat that -- you're saying
6 I didn't choose to --

7 Q. Well, you had choices with how you were going
8 to resign, didn't you?

9 A. At that time there was only one way to resign.
10 Again, as I said it was --

11 Q. My only question is, you had choices, and your
12 answer is no?

13 A. I don't think at that time I had another choice
14 of the way to resign.

15 Q. But you expected that after you resigned there
16 would be this transition period when you would continue
17 to do things?

18 A. Well, I was e-mailed by Bob on my resignation
19 e-mail that things would -- outstanding things would
20 need to be done by me. So I assumed that I would work
21 with Tom as I was about trying to make sure that nothing
22 fell through the cracks.

23 Q. Yeah, but actually in your resignation e-mail,
24 you wrote back, "Bob, please read the e-mail from me
25 below. I have decided to no longer work for you.

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2 Please respect my wishes."

3 Isn't that an indication that you don't want to
4 do anymore work period?

5 A. It was in response to his e-mail, just
6 completely ignoring the fact that I had resigned. And
7 yet if I could just -- in addition --

8 MR. DROGIN: No, it's okay. It's okay.

9 I think it does speak for itself. Let's go to
10 II. Got to get through this. II.

11 (Whereupon, a document Bate Stamped
12 Robinson 1667 was marked as Exhibit II, for
13 identification, as of this date.)

14 Q. This is an e-mail you sent to Bob on June 11,
15 2019, correct?

16 A. Yes.

17 Q. Alright. In the second paragraph you said, I
18 felt forced to resign the way I did. You are very aware
19 of why there was no choice.

20 What did you believe he was aware of?

21 A. He was aware of Tiffany targeting me and aware
22 of my job being taken away from me. He was aware of the
23 hostile work environment. He was aware of -- he was
24 aware of everything. He was CC'd on everything. We had
25 conversations, he was very aware of why I chose to

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2 resign. It was --

3 Q. Well, this -- to be fair, this is your
4 perception of his awareness, right?

5 A. My perception for seeing him on e-mails and
6 having conversations with him and --

7 Q. Your perception. This was your perception,
8 correct?

9 A. I don't think that that would be correct, but
10 --

11 MR. DROGIN: Okay. JJ.

12 (Whereupon, a document Bate Stamped
13 Robinson 1655 was marked as Exhibit JJ, for
14 identification, as of this date.)

15 Q. E-mail you sent on April 9th, do you see that?

16 A. Yes.

17 Q. And you say in the second paragraph, "I will
18 need to be in contact with Robin regarding outstanding
19 Toukie Smith items and other items related to what she
20 and I discussed and worked on. Do I have your approval
21 to call her and discuss these items with her?"

22 Do you see that?

23 A. Yes.

24 Q. Did you believe that you needed Bob's
25 authorization to speak with Robin about these items?

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2 A. I was no longer an employee at Canal
3 Productions and I didn't want to do anything without his
4 approval. So I spoke and asked him if it was okay to
5 have a conversation. I was no longer an employee at
6 Canal, I was in transition. So I felt it was the
7 appropriate thing to do.

8 Q. To get approval?

9 A. To get approval when I'm no longer an employee
10 of Canal Productions.

11 Q. I heard you. Did you ever get written
12 approval?

13 A. On this one, yes, I did.

14 Q. And that was an e-mail?

15 A. Yes, I believe it was. Or yes it was because
16 it would have been a response.

17 MR. DROGIN: Okay. Let's go to KK,
18 please. And spoiler alert, you know this ends
19 at SS because we had to mark the other one TT.

20 (Whereupon, a document Bate Stamped
21 Robinson 4874 was marked as Exhibit KK, for
22 identification, as of this date.)

23 Q. Alright. So KK is an April 10th e-mail you
24 sent to Tom Harvey, correct?

25 A. Yes, this is an e-mail that I sent to Tom

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2 Harvey.

3 Q. Okay. You say in the second paragraph, I've
4 been thinking that it's best we enter into a severance
5 agreement that includes financial compensation,
6 confidentiality provisions and provisions for
7 recommendation and/or mutually agreeable terms.

8 Did I read that right?

9 A. Yes, you read the sentence correctly.

10 MS. HARWIN: Just to clarify, I don't
11 think you did, I think it was read incorrect.

12 Q. I've been thinking that it best we enter into a
13 severance agreement that includes, financial
14 compensation, confidentiality provisions and provisions
15 for recommendations and other mutually agreeable terms.

16 Did I read it right?

17 A. I believe so.

18 Q. Why would you think that Canal would want to
19 enter into a severance agreement with you containing
20 these terms?

21 A. Tom Harvey had asked me in conversation let him
22 know what my needs are. Robin had mentioned that I
23 would receive severance at some point or there would be
24 a conversation about severance. Yeah.

25 Q. So other than Robin -- let's -- with regard to

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2 Tom, when did that conversation with Tom happen? Was it
3 before or after this e-mail, to the best of your
4 recollection?

5 A. This is April 10th um -- I recall having a
6 conversation with Tom, I believe the day after or two
7 days after I resigned where we discussed, you know, a
8 bunch of different outstanding items and other topics.

9 Q. So from your recollection, that had already
10 been discussed before -- on or before April 10th, right?

11 A. He had asked me to let him know what my needs
12 were. And being -- we had been in discussion because of
13 JJ there's an e-mail about us discussing transition
14 um --

15 Q. Alright. Now before resigning you had become
16 aware that Tiffany Chen was asking questions of certain
17 Canal employees about receipts and petty cash; is that
18 right?

19 A. Prior to my resignation?

20 Q. Yes.

21 A. No.

22 Q. Weren't you aware that Tiffany had been asking
23 Kap about petty cash?

24 A. I believe that was after I resigned.

25 Q. Weren't you aware before you resigned that

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2 Tiffany was looking into the apartment accounting that's
3 ██████ to see the moneys that were spent?

4 A. I believe that I had heard that she wanted to
5 look into apartment expenses. But again, all of them
6 had been approved by Bob and the contents of it had been
7 approved by Bob.

8 Q. Well, irrespective of whether they had been
9 approved by Bob, this was something that before you
10 resigned, you heard that she was looking into; isn't
11 that right?

12 A. Yes, she wanted to with the apartment.

13 Q. In fact Robin Chambers made you aware that
14 Tiffany was asking questions about petty cash; isn't
15 that true?

16 A. Not during my employment. After.

17 Q. Okay. After you resigned, Robin told you that
18 Tiffany was speaking to people about you, in an effort
19 to show that you were dishonest; isn't that true?

20 A. Just to clarify, Tiffany was speaking about me
21 to other people to show that I was dishonest.

22 Q. Yes. The question is, didn't Robin tell you
23 that Tiffany was asking questions of people, trying to
24 show that you were dishonest? That's really the
25 question.

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2 A. I can't recall her specifically telling me
3 about people, but there was a discussion on Tiffany's
4 bizarre claims and about -- Robin had said something
5 about Tiffany saying that she was dishonest. I can't
6 recall specifics.

7 Q. So that's my next question, so Robin was
8 actually being questioned about her own expenses by
9 Tiffany, correct?

10 A. I wouldn't say that is correct. It was a Bob
11 and Tiffany.

12 Q. Okay. Bob and Tiffany. And the recordings
13 that you made with Robin, do you recall approximately
14 when the last one was?

15 A. I don't.

16 Q. Was it into the summer?

17 A. Um, the summer being what, June, July, August
18 or --

19 Q. Yeah, June -- well, you resigned in April.
20 June, June --

21 A. Somewhere in the range of between May and June
22 sometime. I can't recall specifically.

23 Q. Okay. But sometime -- I'll ask the question in
24 a different way.

25 Before Canal started this lawsuit against you,

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2 you were actually aware that Tiffany had been asking
3 questions about expenses; isn't that true?

4 A. Just to clarify, my expenses or other people's
5 expenses?

6 Q. Anyone's expenses.

7 A. I recall --

8 Q. Just yes or no. I don't care what you recall.
9 I just want to know if you had an awareness that Tiffany
10 was asking questions about expenses.

11 A. She -- I believe that she was, based on my
12 conversations, but I will say that it --

13 Q. There's no but, it's fine. I just want to show
14 that before this lawsuit was started, you knew questions
15 were being asked. People, were asking questions.
16 That's all I'm trying -- I mean would you agree with me
17 that you knew that? Isn't that fair?

18 A. I think that you're mischaracterizing it. I
19 wasn't aware that she was looking specifically into my
20 expenses. I believe that I spoke to Robin and asked
21 Robin, she said no, you're wrong, you're not even --
22 she's not even -- she's off of you and, you know, on to
23 looking at expenses in the office. So I wasn't aware
24 that she was looking at expenses into me and that's what
25 I was trying to clarify. I wasn't aware of that.

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2 Q. Alright. Now let's go to the recommendation
3 letter. You believed that Tiffany was actually behind
4 Bob's decision not to sign a recommendation letter for
5 you; isn't that right?

6 A. I wouldn't say that is correct.

7 MR. DROGIN: Alright. 7226 at 45
8 seconds.

9 (Whereupon, the recording was played at
10 this time as follows:

11 MS. ROBINSON: That you know, this has
12 been a month and a half of trying to get this
13 letter signed and I'm down to the wire. And
14 he's saying Bob has reservations about signing
15 it he's going to try to rework it so that Bob
16 can -- but he thinks that I should ask Peter or
17 him to sign a letter on my behalf, so you know,
18 it doesn't really, like, you know, do anything,
19 you know, but --

20 MS. CHAMBERS: Is this her -- is
21 this -- I'm reading between the lines, Chase.

22 MS. ROBINSON: What?

23 MS. CHAMBERS: Is this Tiffany?

24 MS. ROBINSON: Not allowing him to sign
25 something?

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2 MS. CHAMBERS: Yeah.

3 MS. ROBINSON: Yeah.

4 MS. CHAMBERS: I mean, I --)

5 MR. DROGIN: We can stop.

6 Q. So did you believe that Tiffany was behind
7 Bob's refusal to sign a recommendation letter for you?

8 A. That was a --

9 Q. Yes or no, you either did or you didn't?

10 A. Overall, no.

11 Q. And you said it's been a month and a half in
12 that audio tape. Did you hear it?

13 A. Yes.

14 Q. So that would place it around the middle
15 towards the end of May?

16 A. Okay. I don't know -- I can't recall when that
17 was -- conversation was.

18 Q. Now you also told Robin at another point that
19 you actually didn't know why but Bob wouldn't sign it;
20 isn't that true?

21 A. I believe there was discussion -- I mean, we
22 had a range of discussions on troubleshooting or
23 thinking or, you know, perspective or you know, there
24 was just a lot of conversations in different directions.

25 Q. Alright. Now in this lawsuit, you claimed that

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2 Bob refused to sign the recommendation letter as an act
3 of retaliation because you had complained about
4 harassment; isn't that true?

5 A. Yes, I said that I would involve a lawyer.

6 Q. Let's come back to my question. In your
7 lawsuit, this lawsuit, you are claiming that one of the
8 acts of retaliation was Bob's refusal to sign a
9 recommendation letter, yes or no?

10 A. Yes, he had --

11 Q. Yes is fine. Yes is fine. You resigned on
12 April 6th, correct?

13 A. Yes.

14 Q. You had been considering business school before
15 you resigned as we saw from those February 2019 e-mails,
16 correct?

17 A. Correct.

18 Q. So this concept of applying to business schools
19 was not something that you came up with after April 6th,
20 correct?

21 A. It had been something I had been thinking about
22 for years.

23 Q. And you first e-mailed Tom Harvey about the
24 need for business school recommendation on May 7, 2019
25 and that's in Exhibit LL.

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2 A. I'll have to look at that.

3 (Whereupon, a document Bate Stamped
4 Robinson 00005128 was marked as Exhibit LL, for
5 identification, as of this date.)

6 Q. It's right at the bottom. It's the last page
7 right at the top. May 7, 2019, 7:52 p.m. Do you see
8 that?

9 I'm in the process of submitting my business
10 school applications and would like to get a few business
11 school recommendations from Bob, this is time sensitive,
12 so I don't miss the application deadlines.

13 Do you see that?

14 A. Yes, I do.

15 Q. So that's a month and a day after you resigned,
16 correct?

17 A. Yes, it seems to be about a month and a day.

18 Q. Alright. And then in -- if you go up to the
19 first page at the bottom, you're still communicating
20 with Tom eight days later.

21 A. Yes.

22 Q. Alright. And this was -- I'll represent to you
23 that May 15th was a Wednesday. So on Wednesday, May
24 15th, you were looking to get this turned around by
25 Monday or Tuesday of the following week; is that right?

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2 A. I was -- yes, I was hoping to send -- it says,
3 I was hoping to send it by Monday or Tuesday.

4 MR. DROGIN: Okay, let's go to MM.

5 (Whereupon, a document Bate Stamped
6 Canal 49267-71 was marked as Exhibit MM, for
7 identification, as of this date.)

8 THE WITNESS: I don't have it.

9 Q. You should have it now.

10 A. Yes, I have it.

11 Q. You e-mailed Bob directly on June 4th?

12 A. Yes.

13 Q. And that was the reference letter to the London
14 School of the Economics?

15 A. Yes.

16 Q. And you followed up with him again on June 7th?

17 A. Yes.

18 Q. In the June 4th e-mail you attached a proposed
19 recommendation letter as well as a separate additional
20 form that the London School of Economics required; is
21 that correct?

22 A. Yes.

23 (Whereupon, a document Bate Stamped
24 Robinson 1669 was marked as Exhibit NN, for
25 identification, as of this date.)

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2 Q. In Exhibit NN?

3 A. NN, Nancy, Nancy.

4 Q. Yeah, Nancy, Nancy. In that e-mail you

5 acknowledge that -- you acknowledge your understanding

6 that Bob was refusing to sign the recommendation letter;

7 isn't that true? In the one, two, three, four, fifth

8 paragraph, you write, "now I've been told by Tom Harvey

9 that you're unwilling to sign the letter of

10 recommendation for the London School of Economics. I've

11 also been given a release to sign by Laurent and Tom

12 Harvey."

13 Do you see that?

14 A. Yes.

15 Q. So as of June 11, 2009 (sic), you were aware

16 that Bob was refusing to sign that recommendation

17 letter; isn't that right?

18 A. No, I don't believe that is correct. I had a

19 conversation with Tom at that time in which he said --

20 um, it was -- I can't recall if it was -- Tom and I had

21 a conversation that he would speak to Bob about how Bob

22 might want to change the draft so that he would sign it

23 and then Tom Harvey said that he would get back to me

24 and then I never heard from Tom Harvey. So I sent an

25 e-mail, but I can't recall specifically what the order

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2 of that was. So for me, Tom said that he would try to
3 see what Bob would sign. Because it was important that
4 my employer sign for --

5 Q. Right. Right. But my question is just this,
6 as of June 11, 2009, you had been told by Tom Harvey
7 that Bob was unwilling to sign a letter of
8 recommendation; isn't that right? Because that's what
9 you wrote.

10 A. I'm looking to see where I wrote that just to
11 confirm.

12 Q. I just read it.

13 A. Oh, June 11th, yes. I was told by Tom and
14 Robin that Bob did not want to sign the letter of
15 recommendation. He went --

16 Q. Alright. And Jeff Pagano's first communication
17 to me was in July of 2019; isn't that right?

18 A. I don't recall the date that you and Jeff
19 Pagano spoke.

20 Q. I was at Tumbled Down in Burlington Vermont
21 with my daughter going to see Twiddle. And I got a
22 voicemail, hey Laurent, it's Jeff Pagano. It was the
23 end of July of 2019, so you knew in June --

24 A. I don't know if it was that --

25 Q. I didn't finish the question. I didn't finish

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2 the question. My point is, you knew in June before Jeff
3 Pagano reached out to me that Bob was not going to sign
4 that letter, didn't you?

5 A. Bob went through with his threat on not giving
6 me -- of giving me a bad recommendation or giving me no
7 recommendation at all. He went through with his threat.

8 Q. He went through with his threat, I'll adopt
9 your words, not to give you a bad recommendation if you
10 left him in the lurch, which is exactly what you did.
11 So he stayed true to form?

12 A. I would say that's incorrect--

13 Q. Okay. Got it.

14 A. --I don't recall him using the word lurch. And
15 also I was in the middle of transition with Tom and
16 working with Tom to facilitate a transition, so I didn't
17 really leave him in the lurch. I said let me know what
18 you need and I'll put it together. So I don't see
19 that -- you know, I disagree with your --

20 Q. That's fine. You can disagree with me. Now
21 this was a part-time Masters program that you were
22 applying for, right?

23 A. LSE was not a part-time Masters program, it
24 was -- yes, it was a part-time Masters program. It
25 was --

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2 Q. Had you taken the GMAT?

3 A. Yes.

4 Q. How many times?

5 A. I had taken it once before.

6 Q. When did you take it?

7 A. I can't recall the year. I think it was, like,
8 a couple of years before 2019.

9 Q. Alright. So it was while you were employed at
10 Canal?

11 A. Yes.

12 Q. Now was this program -- this was a -- so you
13 described it, it's a Masters program with classes every
14 couple of months; isn't that right?

15 A. I can't recall off the top of my head. It was
16 --

17 Q. It wasn't full-time, was it?

18 A. I can't recall off the top of my head, I can't.
19 --

20 Q. Now was this an application or was it just
21 enrollment?

22 A. It was an application.

23 Q. Did you ever wind up applying?

24 A. Yes, I did.

25 Q. So you applied without the recommendation

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2 letter?

3 A. Without Bob's recommendation letter, yes.

4 Q. And the recommendation letter that you wrote
5 for Bob to sign, did it accurately recount what you had
6 done at Canal?

7 A. I would need to reread it again, but I believe
8 it did.

9 Q. I mean this is a letter you were going to have
10 him sign and it was going to be sent in support of your
11 application; isn't that right?

12 A. It was a draft of something that he could
13 change or do what he wanted. I laid out --

14 Q. But what you laid out was truthful and
15 accurate; isn't that so?

16 A. Yes.

17 Q. And why did you think that you would get in?

18 A. I think that when you -- I think with the work
19 that I had done, the resume that I had done, um,
20 personal statements, everything, I was hoping that I
21 would get in.

22 Q. Okay. What was the acceptance rate into the
23 program?

24 A. I can't recall.

25 Q. Now were you going to live and work in London

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2 while you were at school, was that the plan?

3 A. Um, the plan was to work on my own production
4 company, development, projects and attend -- this was a
5 stepping stone for me applying for my MBA. I had --
6 because of the timing of when I left -- okay, I'm not
7 going to continue then.

8 Q. Yeah, please. So it's fair to say then that
9 you didn't know actually what income you were going to
10 have, while you were doing this production business;
11 isn't that true?

12 A. I wouldn't say that that's true. I wouldn't
13 also characterize it in that way.

14 Q. Well, this was essentially a startup that you
15 were going to be heading. What income would you have?

16 A. I would have my savings and money that I had,
17 you know, put toward one day starting a production
18 company.

19 Q. Right. But I'm not talking about that. I'm
20 talking about income, where somebody is paying you money
21 for what you're doing for them. You went into this
22 without a guarantee of income; isn't that true?

23 A. I mean I suppose, yes.

24 Q. Alright. Now Tom Harvey actually told you the
25 reason that Bob was refusing to sign the letter, didn't

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2 he?

3 A. Um --

4 Q. Yes or no.

5 A. He gave me some -- like he gave me something
6 that --

7 Q. Yes or no. I know what he said. The question
8 is just whether Tom told you the reason that Bob was
9 refusing to sign it?

10 A. Yes, he alluded to something. Yes.

11 Q. Okay. Did Tom allude to the fact that Bob said
12 that you were not authorized to transfer sky miles from
13 his account into your personal account?

14 A. No, that's not how it was phrased.

15 Q. Okay. How do you remember it being phrased?

16 A. Bob was upset with something about sky miles
17 being transferred. It was --

18 MR. DROGIN: Okay. 7229 at 5 minutes
19 and 15 seconds.

20 (Whereupon, the recording was played at
21 this time as follows:

22 MR. HARVEY: I had a very brief
23 conversation with him and he's like, I'm not
24 signing it. And part of the problem or part of
25 his thing is there were air miles that you

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2 transferred out of an account that he didn't
3 approve it.

4 MS. ROBINSON: That's not true.

5 MR. HARVEY: What isn't true?

6 MS. ROBINSON: That's not true.

7 MR. HARVEY: Well, that he didn't
8 approve it or you didn't do it?

9 MS. ROBINSON: No, he approved it.
10 It's been a staple thing for over 11 years.

11 MR. HARVEY: Well, I'm just telling
12 you, in his mind transferring -- he knew you
13 used them, but he didn't know you were
14 transferring them out. I mean, there are like
15 four million miles according to him.)

16 Q. Does that refresh your recollection about what
17 Tom Harvey told you?

18 A. Yes.

19 Q. Now you refer to this as a staple thing for
20 over 11 years. Did you hear yourself say that?

21 A. Yes.

22 Q. The staple thing over 11 years was your ability
23 to use sky miles for business and personal travel; is
24 that right?

25 A. Bob and I had different agreements about using

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2 the miles for -- for my travel, yes.

3 Q. Okay. The travel though that we're talking
4 about is during your employment; isn't that right?

5 A. Um, the travel during my employment -- yes, it
6 was when I was employed at Canal Productions.

7 Q. Alright. So the four million miles though,
8 that were moved -- what he's referring to as the four
9 million, I think it's actually closer to five -- but
10 those miles you moved into your account during your
11 employment in 2019; isn't that right?

12 A. There were some transfers that were made in
13 2019 to my account.

14 Q. And then when you left, they remained in your
15 account, correct?

16 A. Some of them had been used during my employment
17 at Canal and others were transferred and there were
18 other trips that I had spoken to Bob and Bob had
19 approved of.

20 Q. I'm talking about the miles that you
21 transferred to your account in 2019 in the months
22 leading up to your resignation, that's what I'm talking
23 about.

24 A. Some of them.

25 Q. Alright. Now this call with Tom where he told

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2 you this, that was before the end of July of 2018; isn't
3 that right? 2019, sorry.

4 A. I can't recall specifically the date.

5 Q. So you then are unclear whether Tom had made
6 you aware of this before or after Mr. Pagano had
7 contacted Canal's counsel?

8 A. Can you say your question again, I was just --
9 MR. DROGIN: No, it's fine. It just
10 occurred to me, if you were represented by
11 counsel, Tom wouldn't have been talking to you.

12 Q. Alright. Now at some point did you call to
13 find out how many sky miles you could transfer within a
14 24-hour period?

15 A. I recall in like, 2017 or '18 um --

16 Q. Okay. And were you aware that you could only
17 transfer 999,000 miles in a 24-hour period?

18 A. Not in a 24-hour period, but in each phone
19 call, was my understanding of it. And then I think I
20 found out that, at some point that it was -- it had to
21 be done -- it was only, like, per day.

22 Q. Per day. And a day is 24 hours, right?

23 A. Yes.

24 Q. Okay. So of the miles that you had in your
25 account when you left, did you use any of those after

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2 you left? Have you used them?

3 A. I don't know specifically if Canal's miles were
4 used.

5 Q. Alright. Now the deal that you had with Bob
6 about the use of the sky miles, when was that deal
7 reached?

8 A. There were many, many, discussions about the
9 sky miles over the decade plus that I worked for Bob.

10 Q. Was there any written memorialization of what
11 the agreement was, your permission to use these miles?

12 A. I don't recall specifically if it was written.
13 I think that there were some e-mails back and forth
14 about the use of the miles, the transfer of the --

15 Q. Not what I'm asking you. Did you have to get
16 approval from him before you transferred miles?

17 A. No.

18 Q. Did you tell him in advance that you were going
19 to be transferring miles at any point when you had this
20 arrangement with him?

21 A. In 2015 he and I had discussed the flexibility
22 and using the miles and with his term, "perk" that they
23 became a perk to me so I could transfer them and use
24 them as I wanted to.

25 Q. Right. What was the deal, if there was one,

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2 when you left? Had that been discussed?

3 A. We had never discussed -- from what I can
4 recall, I can't recall us discussing if I left what
5 would happen to the miles. Again, when I --

6 MR. DROGIN: That's fine. If you can't
7 recall, you can't recall. Can we go to Exhibit
8 D. Actually can we take a five-minute break.
9 Make it 4:15. Can we come back at 4:15, I just
10 want to see how we're doing on time.

11 THE VIDEOGRAPHER: Okay. We are off
12 video record. The time is 4:03 p.m.

13 (Whereupon, a short break was taken at
14 this time.)

15 THE VIDEOGRAPHER: We are back on the
16 video record. The time is 4:17 p.m.

17 Q. Alright. Just to go back for a little bit, Ms.
18 Robinson, you were talking about a document that you
19 were preparing and working on with Tom as part of the
20 transition. Do you recall giving that testimony?

21 A. I recall discussing, yes, the document that I
22 was working on.

23 Q. Isn't it true that you actually never sent that
24 document to Tom?

25 A. We had never finished transition, so I don't

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2 believe that it had been.

3 Q. So you never sent the document to Tom?

4 A. I can't recall sending the document to Tom.

5 MR. DROGIN: Alright. Let's go to
6 Exhibit D, please and thank you.

7 MR. BENNETT: Hold on just a moment
8 Laurent, my apologies for the delay.

9 MR. DROGIN: Should we go off the
10 record?

11 MR. BENNETT: Yes, for a moment please.

12 THE VIDEOGRAPHER: We're off the video
13 record. It's 4:18 p.m.

14 (Whereupon, a discussion was held off the
15 record.)

16 THE VIDEOGRAPHER: We are back on the
17 video record. The time is 4:23 p.m.

18 Q. Alright. And we put up on display the document
19 previously marked as Exhibit D of day one of the
20 deposition, which is the July 11, 2019 letter from Tom
21 Harvey to the Plaintiff.

22 Ms. Robinson, you received this letter on July
23 11th; is that right?

24 A. Yes.

25 Q. You read it at that time?

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2 A. Yes.

3 Q. After you read the letter, why didn't you
4 return any of the property as Tom had suggested or
5 requested?

6 A. When I left Canal Productions, I assumed there
7 would be an orderly transition of documents and
8 information. I had been in touch with Tom regarding
9 this transition and before any transition had been
10 finalized or anything had been returned, I received this
11 threatening -- this threatening letter.

12 Q. So on July 11, 2019 when you received and read
13 this threatening letter, same question, why didn't you
14 return Canal's stuff like he had asked?

15 A. Again, there would be an organized transition
16 and everything or documents and Canal filed their
17 lawsuit and when that was filed, again, there would be
18 an appropriate time or orderly transition to this.

19 Q. I'm just trying to find out, when you get a
20 letter from an attorney and it says please return the
21 property, why you thought there was going to be any
22 further discussion about this and why you didn't just
23 return it?

24 A. Because there was going to be an orderly
25 transition to return the property. Canal filed their

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2 lawsuit and during that -- during that period, again,

3 there would be the correct time to --

4 Q. No, no, no, no, no. I'm not up to that. Why
5 wasn't the correct time when the request was made. Why
6 wasn't that the correct time?

7 A. I assumed that there was going to be an orderly
8 transition of -- of these documents and then Canal filed
9 the lawsuit. We --

10 MR. DROGIN: Well, Canal filed the
11 lawsuit more than two months later. I'm sorry,
12 more than a month later. Okay. We have your
13 answer.

14 Q. When you received Mr. Harvey's letter, did you
15 discuss with anyone other than an attorney whether or
16 not you should return any of this property?

17 A. I don't -- I don't recall discussing that. I
18 think that what was discussed was the other contents of
19 the -- of the letter. Like that's what -- it's not that
20 it was discussed. It's that it was sort of the -- the
21 focus was the -- knowing these false allegations and --

22 Q. I have no idea what you're talking about. My
23 question was whether or not you discussed with anyone
24 other than an attorney -- other than an attorney whether
25 you should be returning the property as you were asked

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2 to do, yes or no?

3 A. Not that I can recall.

4 Q. And did you discuss it with Mr. Pagano?

5 MS. HARWIN: Objection. And she's not
6 to discuss during the deposition anything she
7 discussed with her counsel.

8 MR. DROGIN: I'm not asking for the
9 substance of the communications. I'm simply
10 asking whether or not you discussed returning
11 the property with him.

12 MS. HARWIN: I direct her not to
13 answer.

14 Q. Okay. Did you ever discuss the returning of
15 the property with your current counsel?

16 MS. HARWIN: Direct her not to answer.

17 MR. DROGIN: I'm not asking for the
18 substance of the communications. I'm asking
19 whether the communications ever took place.

20 MS. HARWIN: Directing her not to
21 answer.

22 Q. Why did you retain Canal's property after the
23 lawsuit had been filed?

24 A. There would be an orderly transition to
25 returning the documents. At first ESI was the focus.

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2 Eventually the judge sent the deadline for documents and
3 they were returned at that point, you know, by the
4 deadline.

5 Q. The deadline meaning the last day of discovery,
6 that's when the documents were produced, right?

7 A. I can't -- for some reason, I can't recall
8 that.

9 Q. How did you send them, by the way to Mr.
10 Bennett's office?

11 A. They were picked up by a car and brought to
12 Greg office.

13 Q. So they traveled by car?

14 A. Yes, the characterization of truck delivery is
15 incorrect.

16 Q. Okay. So the problem here is they traveled by
17 car not truck, right, we have that wrong?

18 A. Yes.

19 Q. Okay. Got it. Did an attorney tell you that
20 you should not return this property?

21 MS. HARWIN: Objection. And again I'm
22 directing her not to reveal any attorney/client
23 communications.

24 MR. DROGIN: Are you directing her not
25 to answer the question?

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2 MS. HARWIN: Yes, I just stated that.

3 Q. Did you ever have a discussion with anyone
4 other than an attorney about whether or not they thought
5 you should return some of this stuff?

6 A. Not that I can recall because it was always the
7 intention for this stuff to be returned. I preserved it
8 during my transition, packaged up the petty cash.

9 Q. You're going too far. I mean your mother lives
10 with you, right?

11 A. At times, she does.

12 Q. Alright. So was there ever a conversation
13 between you and her in sum and substance, Chase, when
14 can we get all this crap out of the apartment? Was
15 there ever such a conversation?

16 A. There was never a conversation where we
17 discussed getting any crap out of the apartment.

18 Q. Well, I don't mean verbatim. But all this
19 stuff that you had, nine boxes, was there ever a
20 discussion with your mother about when it could be
21 removed?

22 A. I don't recall ever speaking to my mother about
23 items that I had here. Again, I preserved them and was
24 waiting for an orderly transition of this.

25 Q. Okay. How come you didn't send it to your

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2 attorney's office?

3 MS. HARWIN: Objection. And to the
4 extent discussions about that would necessarily
5 implicate communications with her attorneys I
6 would direct her not to answer.

7 Q. Alright. Is there a reason you didn't send
8 them to your attorneys?

9 MS. HARWIN: Same direction.

10 MR. DROGIN: Hmm.

11 Q. When you started your lawsuit against Mr. De
12 Niro and Canal, had you made your attorneys aware that
13 you were in possession of this property that you
14 subsequently returned?

15 MS. HARWIN: Again, all of this
16 impinges on attorney/client communications. I
17 direct her not to answer.

18 MR. DROGIN: That's factual. How is
19 that privileged? It's simply, did you make
20 your attorneys aware of it.

21 MS. HARWIN: Direct her not to answer.

22 MR. DROGIN: Alright. Well, we're
23 going to preserve this line of questioning
24 because I do intend to pursue it. I think
25 you're wrong, but I'm not going to burn my time

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2 if you're going to keep directing her not to
3 answer. So we'll just note that in the record.
4 Now can we pull up Exhibit OO, which are the
5 Pagano e-mails?

6 MS. LAZZARO: It should already be in
7 the chat, I think I uploaded it again.

8 (Whereupon, the Pagano e-mails were
9 marked as Exhibit OO, for identification, as of
10 this date.)

11 Q. In Exhibit OO, I'm hoping we have just e-mails.
12 Now in his first e-mail to me, which is a three-page
13 document, his first e-mail is page -- oh, I see, sorry,
14 my bad. This is just the 13th e-mail.

15 Tom's letter actually told you that you would
16 be sued if you did not return the property, didn't he --
17 didn't it?

18 A. I can't recall the exact line at this moment
19 that was in.

20 Q. So the last line was, please return the sky
21 miles immediately to avoid legal action.

22 Do you see that?

23 A. That's what the line says.

24 Q. Now in Mr. Pagano's e-mails, he actually never
25 made any mention of returning the sky miles, did he?

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2 A. Let me read it.

3 MS. HARWIN: Counsel, can you clarify
4 which e-mail or e-mails from Mr. Pagano you're
5 referring to.

6 MR. DROGIN: I'll withdraw the question
7 because I don't want to take the time. I'll
8 make a representation that there's nothing in
9 the Pagano e-mails about returning any of the
10 property that had been requested.

11 Q. Now, wasn't the real purpose here of Jeff
12 Pagano sending these e-mails, wasn't it intended to
13 scare Bob so he wouldn't sue you?

14 A. No.

15 Q. Isn't that what you're trying to do, trying to
16 throw up all these allegations so Bob wouldn't sue you;
17 isn't that what this is all about?

18 A. No.

19 Q. All right. Now had you told Pagano about the
20 difference between Riverside, Tribeca Productions,
21 Tribeca Film Center, Tribeca Enterprises and Tribeca
22 Film Institute?

23 MS. HARWIN: Objection. I direct her
24 not to answer.

25 Q. Did you tell him that you worked for any of

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2 those entities?

3 MS. HARWIN: Objection and I direct her
4 not to answer.

5 Q. Any idea why he mentioned those entities in his
6 e-mails?

7 MS. HARWIN: Which e-mails are you
8 referring to, Counsel?

9 MR. DROGIN: The e-mails that you're
10 directing her not to answer about where he
11 talked about suing those entities.

12 MS. HARWIN: The direction not to
13 answer has to do with attorney/client
14 communications. If you're asking a question
15 about the e-mail, please identify the e-mail.

16 MR. DROGIN: Okay. I'll move on.
17 Again, if you don't know the answer, you don't
18 know the answer.

19 Q. If you take a look at the last sentence of Mr.
20 Pagano's e-mails that we have in front of us, OO. I'm
21 sorry, it's the last paragraph -- the second to last
22 paragraph, not the last sentence. Three lines up from
23 the bottom, he says, "unfortunately based on the false
24 statements set forth in Mr. Harvey's letter, false
25 statements made by Mr. De Niro to co employees among

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2 other person's in the industry, Ms. Robinson's future
3 opportunities are very narrow at this time and she may
4 have few options." Do you see that?

5 A. I'm sorry, let me -- I'm just trying to make
6 this bigger. For some reason it's so small. Um, yeah,
7 I see that.

8 Q. Okay. What false statements did Bob make?

9 A. The knowingly false allegations of stealing, of
10 sky miles, of everything that was in Tom Harvey's
11 letter.

12 Q. Right. But I'm looking at the part where it
13 says "false statements made by Mr. De Niro to
14 co-employees among other persons in the industry".

15 What false statements are you aware of made by
16 Mr. De Niro to co-employees among other persons in the
17 industry? What false statements?

18 A. That --

19 MR. DROGIN: Why don't we leave it
20 blank and you can fill it out.

21 (INSERT) _____.

22 REQUEST NOTED

23 Q. Did you believe at that time August 13, 2019
24 that your future opportunities were at that time "very
25 narrow" and that you may have "few options"? Did you

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2 believe that to be true?

3 A. Yes, with the false allegations and also Bob
4 um, going through with his threat on giving me a bad
5 recommendation. The industry itself is based on
6 networking and recommendations. Bob giving me a bad
7 recommendation would limit my future and my options.

8 Q. Yeah, in August actually there was no one that
9 you were seeking a recommendation for, right?

10 A. I was seeking a recommendation to further my
11 education.

12 Q. Alright. So just to be clear, as of August
13 13th, 2019, you felt that your future opportunities were
14 very narrow and that you may have few options; is that
15 right?

16 A. Yes.

17 Q. And just so we're clear that was before Canal's
18 lawsuit against you was ever filed, correct?

19 A. That was before Canal's lawsuit was filed.

20 Q. When did you decide to bring your lawsuit
21 against Canal and Mr. De Niro?

22 MS. HARWIN: And let me clarify that
23 you're not to disclose attorney/client
24 communications.

25 Q. At some point you decided to bring a lawsuit

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2 against Canal and Mr. De Niro, correct?

3 A. Yes.

4 Q. Was that before or after Canal had sued you?

5 A. Before.

6 Q. And do you know when Bob or Canal first
7 contacted the New York County District Attorney's
8 office?

9 A. I can't recall.

10 Q. Okay. Do you know whether it was before or
11 after you had brought your lawsuit against Canal and Mr.
12 De Niro?

13 A. I don't recall.

14 MR. DROGIN: Alright. Can we go to
15 Exhibit PP.

16 MS. LAZZARO: It's dropped in the chat.
17 (Whereupon, a document entitled TH
18 Communications with DA was marked as Exhibit
19 PP, for identification, as of this date.)

20 MS. HARWIN: It appears that these are
21 multiple separate documents that are not Bates
22 labelled.

23 MR. BENNETT: These were certainly
24 produced in discovery as one compilation as
25 you're seeing it now. I will find out the

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2 Bates numbers and ensure that they are properly
3 inserted into the record.

4 MS. HARWIN: Thank you.

5 Q. Alright. So I'm looking at a text message, hi
6 Tom, this is Kelly Thomas from the District Attorney's
7 office, if you could e-mail me at -- and then there's an
8 e-mail address -- with the details of the meeting that
9 we're planning to have Monday, September 16th at noon
10 that would be greatly appreciated. Thanks so much again
11 for your help coordinating. Do you see that?

12 A. Yes.

13 Q. Alright. And the text message indicates it was
14 sent September 12, 2019 at 12:49 p.m., correct?

15 A. Yes, that's correct.

16 Q. And your lawsuit was filed on October 3, 2019;
17 isn't that right?

18 A. Yes, I believe so.

19 Q. So before your lawsuit was filed, there are
20 communications here between Mr. Harvey and the New York
21 County District Attorney's office; isn't that correct?

22 A. Yes.

23 Q. In Paragraph 39 of your Complaint, you indicate
24 that an investigation into you or into your activities
25 began after you resigned.

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2 MR. DROGIN: Can we pull up that -- I
3 think it's J.

4 MS. HARWIN: And while you're bringing
5 up that additional exhibit, I would just note
6 for the record, I don't believe this e-mail
7 referenced in this series of text messages that
8 Mr. Harvey said he would be e-mailing in 30
9 minute was ever produced to us. So we would
10 request the production of the document.

11 MR. DROGIN: I actually didn't hear
12 what you said, but okay.

13 MS. HARWIN: I said we would request
14 the production of the document, the e-mail
15 referenced in this series of text messages,
16 which I don't believe has been produced to us.

17 MR. BENNETT: To the extent it exists,
18 I'll look into it. But, I mean, as far as I
19 understand it, we've produced all
20 communications.

21 Q. Do you believe that the investigation into your
22 alleged wrongdoing began after you resigned?

23 A. I'm sorry am I looking at J?

24 Q. Yeah, Paragraph 39.

25 A. Sorry, one second.

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2 Q. Can you see it?

3 A. Yes, can you repeat your question.

4 Q. Why do you believe the investigation began
5 after you resigned?

6 A. I wasn't aware of any investigation prior to
7 departing Canal. And I believe Tom Harvey's letter also
8 says that an investigation was initiated after I
9 resigned or after I left.

10 Q. I understand what you're saying. What was the
11 heightened scrutiny that you're talking about?

12 A. I believe I had been subjected to -- to -- I
13 had never witnessed any employee departing and having
14 investigation in -- in like the way that they did with
15 me. I was also -- it was an investigation that was -- I
16 was targeted, I was targeted for my protected activity.
17 There was -- the way -- the false allegations of Tom
18 Harvey's thing was --

19 Q. I have no idea what you're talking about or
20 what you just said. So can you just tell me what the
21 heightened scrutiny was?

22 A. Looking into all my expenses, to having Canal
23 employees um, look through my expenses, it had never --
24 there had never been um, anything like this before.

25 Q. Right. Is there any document that indicates

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2 how many vacation days you're supposed to get?

3 A. As a general policy or in --

4 Q. How do you know how many vacation days you're
5 supposed to get?

6 A. I believe I was given that information when I
7 first um, became employed at Canal Productions and was
8 told that there was one additional day per year that you
9 had worked at Canal.

10 Q. Alright. And you're -- I think you testified
11 earlier that you never really had a vacation; is that
12 true?

13 A. I never really got a vacation day, day off.

14 Q. Okay. So why do you think that you were
15 entitled to be paid for days that you never took?

16 A. That vacation pay back was a policy at Canal
17 Productions prior to my employment. And each year,
18 regarding my vacation pay, I would speak to Bob and go
19 over my travel, the days that I was away, the days that
20 I was working while I was away, the holidays in which I
21 worked, such as Labor Day or through Christmas and Bob
22 and I would discuss and he would approve of the days
23 prior to me sending them to Berdon and CCing him on
24 them.

25 Q. So in other words, you wouldn't take any

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2 vacation, but then you would sit down with Bob and
3 discuss how many vacations days you had taken, is
4 that --

5 A. I wouldn't -- let me clarify. It's not
6 vacation days, it's working while away. Vacation was a
7 misnomer because I was required to be available for Bob
8 and I worked while I was away. I also worked on
9 holidays and that was a discussion and in consideration
10 of what Bob and I discussed when we discussed the
11 vacation pay each year.

12 Q. Alright. So it was really a discussion at the
13 end of the year about how much additional money you were
14 going to be paid; is that you're telling us?

15 A. On what vacation time I didn't get and then in
16 addition, you know, what holidays that are holidays that
17 I worked through or times that the office were closed
18 that was a discussion between Bob and I. Because I was
19 never able to take vacation because I was required to be
20 available for Bob while I was away. So it wasn't
21 vacation days. It was working while away, even though
22 the words can get -- can be interchanged at times, it
23 really -- it was working while away and that's what Bob
24 and I had agreed.

25 Q. So if you wrote an e-mail to someone saying my

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2 vacation was fun, that was actually a misnomer because
3 you weren't on vacation, is that what you're saying?

4 A. I couldn't take a hypothetical, I would need an
5 example of that, but --

6 Q. Alright. That's fine. Let's talk about
7 Netflix now. I know you're dying to tell us the story
8 here.

9 Canal had a Netflix account, didn't it?

10 A. Yes.

11 Q. You had access to it?

12 A. Yes.

13 Q. Kap had access to?

14 A. Yes.

15 Q. Do you know if anyone else had access to it?

16 A. Yes.

17 Q. Who else had access to it?

18 A. Bob had access to it. Anybody in the Canal
19 office when the password was listed in the contacts had
20 access to it. Anybody who was able to log into the
21 Canal Productions computer had access to it.

22 Q. Okay. And you would use that account, wouldn't
23 you?

24 A. At times, yes, I would.

25 Q. Sometimes you would use it while you were on

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2 vacation -- I'm sorry, sometimes you would use it when
3 you were not in the office or your home office; isn't
4 that right?

5 A. When I wasn't in my home office or my office,
6 so while I was working while away, is that what you're
7 asking?

8 Q. Yes.

9 A. I believe at time, yes.

10 Q. And sometimes you would use it while you were
11 working; isn't that right?

12 A. Very rarely would I have something playing in
13 the background. Very, very, rarely. There was only one
14 time that I can recall.

15 Q. So you've seen because we produced the Netflix
16 viewing logs from the Canal account.

17 Have you had an opportunity to see them?

18 A. Yes, but I think -- I don't recall like, all of
19 the information on them.

20 Q. Just asking if you've seen them. Yes?

21 A. Yes.

22 Q. Okay. Did you spend long periods of time binge
23 watching certain shows on Netflix?

24 A. No.

25 Q. And do you have any idea who had access to

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2 Canal's account who might have been doing that?

3 A. I don't know who would have been -- who would
4 binge watch on Canal Productions Netflix account.

5 Q. Alright. So when you're in the office -- and I
6 think you said you were in the office couple of times a
7 week in 2018 and 2019 -- did you ever see anybody
8 watching movies -- sorry, shows or movies in the office?

9 A. 2018 or 2019 is what you're asking?

10 Q. Yes.

11 A. Does that include Bob's children, his daughter
12 or --

13 Q. Any -- I'm talking about a Canal employee,
14 let's limit it to that.

15 A. Canal employee, um, Michael Kaplan used to have
16 a sports game playing in the background while he worked
17 on petty cash receipts.

18 Q. On Netflix?

19 A. Oh, specifically on Netflix --

20 Q. Just talking about Netflix. So since you were
21 coming into the office several times a week, I'm just
22 wondering if you ever observed other Canal -- any other
23 Canal employees watching shows on Netflix while you were
24 there?

25 A. Not that I can recall.

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2 Q. Was there a policy -- did Canal have a policy
3 about when Ubers or taxis could be charged to the
4 company's account?

5 A. Or -- just to clarify, or reimbursed?

6 Q. Or reimbursed.

7 A. Yes, there was a general policy in the office.

8 Q. Okay. Was that a written policy?

9 A. I don't recall it being written.

10 Q. Who administered the policy?

11 A. Can you clarify administer.

12 Q. Ensured that it was being followed.

13 A. People who reviewed the Amex card or the petty
14 cash, Mike Tasch, people at Berdon, Bob himself who met
15 with Berdon about Canal expenses.

16 Q. Who role, if any, did you have in administering
17 that policy?

18 A. I reviewed Amex bills with Michael Kaplan.

19 Q. Anything else?

20 A. I had spoken -- I probably had spoken -- no, I
21 had spoken to Bob and gone over Amex bills with him at
22 times. That's what I can recall at this moment.

23 MR. DROGIN: Okay. Can we go to RR.

24 (Whereupon, a document Bate Stamped

25 Robinson 00002100-01 was marked as Exhibit RR,

1 GRAHAM CHASE ROBINSON-CONFIDENTIAL

2 for identification, as of this date.)

3 Q. It's a two-page document you produced as
4 Robinson 2100 and 2101. Do you see it?

5 A. Yes, let me read it.

6 MR. DROGIN: Why don't we go off the
7 record. Because I don't want to run out of
8 time. Let's go off the record, please.

9 THE VIDEOGRAPHER: Okay. We're off the
10 video record. The time is 4:55 p.m.

11 (Whereupon, a discussion was held off the
12 record.)

13 THE VIDEOGRAPHER: We are back on the
14 video record. It is 4:57 p.m.

15 Q. We're looking at Exhibit RR. Is this a
16 document you prepared, Ms. Robinson?

17 A. This is a document of my notes.

18 Q. Is this a document that you prepared?

19 A. It is a document that I typed up.

20 Q. Alright. And why did you type it up?

21 A. They were notes and thoughts about office
22 protocols and I was always looking to sort of improve or
23 discuss with Bob items. These were some of the points
24 of issues that were in the office and things that, you
25 know, either should be changed -- you know it's just --

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2 it was a rolling list of my thoughts on things.

3 Q. Were any of these every implemented?

4 A. Michael Kaplan has always been in charge of
5 petty cash for one.

6 Q. When you said he was in charge of petty cash,
7 you were actually managing the office, weren't you?

8 A. At times managing the office, but I wasn't
9 managing petty cash. That was Michael Kaplan since the
10 beginning of my employment he was always in charge of
11 petty cash and spoke to Berdon about petty cash --

12 Q. My only question was whether you were managing
13 the office and you answered it.

14 Did you discuss any of these policies with Bob?

15 A. Yes, at times we had -- Bob and I had many
16 conversations about office expenses and issues in the
17 office over the years.

18 Q. He would discuss those office issues with you?

19 A. It would be a combination --

20 Q. It's a yes or no.

21 A. I was one of the people, yes. I would speak to
22 him about them.

23 Q. And was this a depiction of how you wanted
24 things to function in the office?

25 A. I think there were certain things on here that

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2 I would have liked or I thought made logical sense.

3 Q. And therefore, you could have brought them to
4 Bob's attention and see if he would support your
5 implementing them; is that right?

6 A. Um, can you repeat your question. Sorry, I
7 want to --

8 Q. Sure. This is things that you could have
9 spoken with Bob about to see if he would agree that you
10 implement them; isn't that right?

11 A. It's correct that i would have to speak to Bob
12 to implement anything along the lines of this. There
13 were many discussions I had with Bob about --

14 Q. I'm not asking about that. I'm just asking
15 you, isn't it true that you could have spoken with him
16 about these things to see whether or not he wanted you
17 to implement them, yes or no?

18 A. I mean I could have spoken to him about this,
19 yes.

20 Q. Alright. Marianna Shafran is a publicist; is
21 that right?

22 A. Uh, yes. Or I believe so.

23 Q. She previously worked with Stan Rosenfield?

24 A. Yes.

25 Q. Stan is Bob's long-time publicist?

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2 A. Yes.

3 Q. And you e-mailed her in June of 2019 about the
4 production company that you had started; is that right?

5 A. Um, I -- I had e-mailed I --

6 MR. DROGIN: I'll help you. Exhibit
7 SS.

8 (Whereupon, a document Bate Stamped
9 Robinson 00005231 was marked as Exhibit SS, for
10 identification, as of this date.)

11 THE WITNESS: I had e-mailed her about
12 a bio.

13 Q. Well, the last paragraph it says, "currently
14 Chase has started her own production company with the
15 objective of developing features and series that focus
16 on social interests, such as women's rights, inequality,
17 immigration and corruption. Do you see that?

18 A. Yes.

19 Q. What production company had you started as of
20 June 13, 2019?

21 A. I had Chase Robinson Productions.

22 Q. And was that a legal entity or was it just a
23 doing business as name?

24 A. It was an LLC.

25 Q. When was the LLC formed?

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2 A. Sometime in 2017.

3 Q. So during your employment with Canal, you
4 formed a separate business entity; is that right?

5 A. I formed an LLC, it's something that I did
6 discuss with Bob and he was aware of.

7 Q. I'm not suggesting otherwise. I'm just looking
8 to confirm the facts.

9 Okay. So in June of 2019 when you sent this
10 e-mail to Ms. Shafran, had you in fact begun doing any
11 work under your production company name?

12 A. I had -- yes.

13 Q. And since then in June of 2019, has your
14 production company generated any income?

15 A. No.

16 Q. Is it still in operation?

17 A. The LLC is still open.

18 Q. Are you currently attempting to work through
19 your LLC?

20 A. No, not at this moment.

21 Q. Now Marianna Shafran, is that someone you
22 vacationed with in the past?

23 A. It's somebody I took trips with.

24 Q. When you say trips, do you mean business trips
25 or non-business trips?

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2 A. Working while away. For example, the Christmas
3 holiday when the office was closed for two weeks.

4 Q. So when the office was closed for two weeks,
5 you would take a non-vacation with her?

6 A. I would take a trip while I -- was working
7 while I was away and Marianna and I had taken a couple
8 of trips together.

9 Q. During your employment with Canal?

10 A. Some of them during my employment with Canal.

11 Q. So the office was closed when? At the end of
12 the year?

13 A. Typically it was closed for two weeks, the two
14 last weeks of December.

15 Q. And that -- and during that period of time when
16 the office closed, that would be your non-vacation
17 period, when you would be working?

18 A. I would still be working as Bob wanted me to be
19 on call and available for him 24/7. I still worked, but
20 I --

21 Q. But you obviously -- you did have the
22 opportunity to go away at that time, right, during that
23 two-week period?

24 A. Yes.

25 Q. Did you go to Hawaii with Marianna Shafran?

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2 A. No.

3 Q. Did you go to London with Marianna Shafran?

4 A. I've been to London with Marianna.

5 Q. How many times?

6 A. During my employment with Canal?

7 Q. Yes.

8 A. I believe once or twice.

9 Q. Were you a co-manager on Canal's Amex account?

10 A. Co-manager?

11 Q. Yes.

12 A. Co account manager? Yes. For a small period.

13 Q. Yes is fine. Yes is fine. Did you ever use
14 the Amex card, the Canal Amex card to pay for personal
15 expenses?

16 A. Unless it was approved, I can't recall ever
17 using the card -- actually you know what, let me
18 clarify, I -- unless it was approved where it was a gift
19 from Bob or something like that, the Canal Amex would be
20 used. But other than if it was a mistake, which we
21 already discussed in my last deposition, I would pay
22 back or reverse the charge, so no.

23 Q. And in tracking this, would you in any way mark
24 or designate personal expenses in some way on the
25 receipts or on the invoices?

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2 A. It was very rare. There were only a small
3 handful and they were -- they were -- the charge was
4 reversed, either before it even hit the bill or right
5 after it did and it showed the charge being put back on
6 the credit card or I paid Canal for their mistake, which
7 would have been in record with Berdon.

8 Q. And you're -- the deal at Canal was that if you
9 were in the office, the company would pay for lunch and
10 coffee; is that right?

11 A. That is not correct.

12 Q. What was the deal with meals in the office?

13 A. The general policy at Canal was if you were
14 working, your meals were paid for, coffee and lunch.
15 Employees had about \$10 for lunch, \$20 -- I'm sorry, \$10
16 for breakfast, \$20 for lunch, 30 for dinner. Whereas I
17 had spoken to Bob about having \$20 for breakfast, \$30
18 for lunch and \$50 for dinner due to traveling and that I
19 had a title. So he and I -- he approved of that.

20 Q. So that was a perk that you had?

21 A. I had a little extra of a perk there. But
22 again, it was during working hours when I was working
23 and I often worked from before breakfast until way -- by
24 the time -- like, in going to bed, that's when I
25 stopped.

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2 Q. So is it fair to say then that you frequently
3 charged Canal up to \$100 a day for meals?

4 A. I wouldn't say that is necessarily correct.

5 Q. But your allowance as you're telling us was
6 \$100 a day, 20, 30 and 50; is that right?

7 A. If I was working during those meals. I wasn't
8 always working. I didn't always charge Canal for things
9 and sometimes I didn't even eat.

10 Q. Okay. And would that also extend to groceries?
11 So if you didn't want to, let's say order in or pick up,
12 that you could go to, let's say, Dean and Deluca or
13 Whole Foods or something like that and just buy
14 groceries?

15 A. I wouldn't characterize --

16 Q. I'm not asking you to characterize it. We're
17 talking about a meal reimbursement policy and what I'm
18 ask is, in leu of a meal, could you buy groceries at a
19 supermarket and bill it to Canal as a meal?

20 A. Well, I mean you're referencing Dean and Deluca
21 and Whole Foods both have prepared food there. There
22 wasn't any policy that you couldn't buy the contents of,
23 like a salad and make a salad. At times, you know, I
24 picked up items for snack, like, fruit or something for

25 [REDACTED] I --

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2 Q. Okay. So there are -- we've seen charges on
3 the Amex card for Dean and Deluca, Whole Foods, Paolas;
4 P-A-O-L-A-S.

5 Is it your testimony that these expenses were
6 all related to author -- meals that you were authorized
7 to charge to the company?

8 A. Yes.

9 Q. And is that -- is that policy memorialized in
10 any writing?

11 A. I can't recall a specific -- a specific
12 document where it's written.

13 Q. Alright. And did um -- Canal had a policy
14 where employees could charge a gym membership; is that
15 right, a monthly amount?

16 A. I wouldn't characterize it that way. It --

17 Q. That's okay. Did you ever charge Pilates
18 classes on the company Amex card?

19 A. No, I was given a gift --

20 Q. No, is fine, dog's getting upset. Did you ever
21 charge a dog sitter?

22 A. No, I've never --

23 MR. DROGIN: Stop.

24 Q. Keep going dry cleaning is next. What about
25 dry cleaning? Was that part of the deal where you could

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2 charge dry cleaning on the company Amex card?

3 A. I can't recall a time where I've ever charged
4 dry cleaning to a Canal card and I also cannot recall a
5 time where I charged dog sitting on the Canal Amex card.
6 If you referring to the petty cash, then I can answer
7 that question.

8 Q. Let's limit it then to the petty cash. You can
9 answer the question.

10 A. Yes, Bob approved of me for a short period of
11 time charging dog sitting when I had to find his [REDACTED]
12 apartment and my dog was dying of cancer.

13 Q. When was that?

14 A. Um, 2018.

15 Q. I'm sorry.

16 A. 2018.

17 MR. DROGIN: Alright. Can we go to QQ
18 please. Just about done here, we're almost out
19 of time. Hey Britt, this particular page here
20 that you wanted me to reference, just to save
21 time, just point me to it?

22 MS. LAZZARO: I mean it's just a
23 collection of over the years and a separate
24 breakdown for unused and used vacation days.
25 It's already marked and I over zealously tossed

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2 it in the chat so --

3 MR. DROGIN: Alright. We'll just mark
4 it as QQ as you've done.

5 (Whereupon, a document Bate Stamped
6 Robinson 799 was marked as Exhibit QQ, for
7 identification, as of this date.)

8 Q. So Ms. Robinson, take a look at QQ. And really
9 the only question is are these the e-mails that you sent
10 between 2011 and 2018 memorializing the number of
11 vacation days that you did or didn't use for a
12 particular year, that's my only question?

13 A. Well, I'm looking.

14 Q. Yeah. I'm just asking for you to confirm that
15 those are the e-mails that you sent, just so we
16 understand how many vacation days you did or didn't take
17 according to your testimony? Ready?

18 A. I'm on 2016. I'm almost done.

19 MS. HARWIN: And Counsel, I believe you
20 have five minutes left.

21 MR. DROGIN: We can go off the record
22 then if she wants.

23 THE WITNESS: I believe that these are
24 some of them. I don't know if it's all of
25 them.

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2 Q. Okay. In March of 2018, you took a trip to
3 California and you met with Amelia Brain; is that right?

4 A. It wasn't the purpose of the trip, but yes, I
5 met at the time with Amelia Brain.

6 Q. Okay. You rented a car?

7 A. Yes, I had a car rental.

8 Q. Okay. And you took Ubers --

9 MS. HARWIN: And Counsel, I believe
10 you're out of time at this point. The
11 videographer can confirm.

12 MR. DROGIN: Alright. I'd ask for a
13 three-minute grace period. What do you think?

14 MS. HARWIN: We'll give you a
15 one-minute grace period.

16 MR. DROGIN: Two. How about two?

17 MS. HARWIN: We'll give you 90 seconds.

18 Q. What was the purpose of that trip?

19 A. The primary purpose of that trip was going to
20 look at hotels for Bob -- sorry for Toukie Smith for the
21 possibility of her [REDACTED]

22 Q. Right. Now Toukie Smith stayed in the J.W.
23 Marriot in Santa Monica, didn't she? I mean that was
24 her hotel of choice?

25 A. It was like low mark -- like I can't recall

1 GRAHAM CHASE ROBINSON-CONFIDENTIAL

2 what the hotel was, but there was hotel that Bob and I
3 discussed when I was in LA that that was really the only
4 place that she would stay --

5 Q. I'm not asking about that. Isn't it true that
6 that hotel had already been booked for Toukie Smith two
7 days before you left for California?

8 A. I don't recall when it was put on hold, but I
9 did put it on hold just in case that that was the place
10 that she might stay.

11 Q. And while you were there with Amelia, you took
12 her and some friends to Nobu for lunch; is that right?

13 A. For lunch, no.

14 Q. Dinner?

15 A. We had dinner at Nobu.

16 Q. With her and some of her friends?

17 A. I believe it was one or two friends.

18 MS. HARWIN: Okay. Counsel we're past
19 time.

20 Q. Was it her birthday?

21 MS. HARWIN: Counsel, we're past time.

22 MR. DROGIN: One more question, one
23 more question. Last question.

24 Q. During that trip, you stayed at the Montage in
25 Beverly Hills; isn't that right?

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2 A. Yes.

3 MR. DROGIN: Okay. Your Counsel says
4 I'm done. Alright. So we will review the
5 transcript, and if there's any reason that we
6 feel we need more time, we'll meet and confer
7 with you and we'll work it out from there. I'm
8 not suggesting that there is, I'm just
9 documenting it.

10 MR. BENNETT: Just to fill in the
11 record Ally, on that one recording, 7174, it
12 ended -- it went from one minute, 18 seconds --
13 excuse me, one hour, 18 minutes 25 seconds to
14 one hour 19 minutes 25 seconds. Brooke, if you
15 have any questions about that, which exhibit it
16 is, just let me know and I'll clarify it.

17 MS. HARWIN: Well, Counsel none of the
18 recordings that were used were labeled as
19 exhibits. So all of those need to be -- you
20 know the excerpts need to be provided, you
21 know, so that they are included with the
22 deposition transcript.

23 I would note that plaintiff reserves
24 the right to review and provide corrections to
25 her deposition transcript pursuant to rule 30 E

1 GRAHAM CHASE ROBINSON-CONFIDENTIAL

2 and I'd also note to everyone that pursuant to
3 the confidentiality order in this case, that
4 the deposition shall be treated as confidential
5 for a period of 30 days so that plaintiff may
6 provide that confidentiality designation. And
7 I believe with that we can close for today.

8 THE VIDEOGRAPHER: Okay. We're going
9 off the video record. The time is 5:19 p.m.
10 and that concludes our deposition.

11 (Time Noted: 5:19 p.m.)

12

13 GRAHAM CHASE ROBINSON

14

15 Subscribed and sworn to before me

16 this day of 2022.

17

18

19 Notary Public

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1 C E R T I F I C A T E

2 I, BROOKE E. PERRY, hereby certify that the
3 Examination Before Trial of GRAHAM CHASE ROBINSON was
4 held before me on the 9th day of February, 2022; that
5 said witness was duly sworn before the commencement of
6 her testimony; that the testimony was taken
7 stenographically by myself and then transcribed by
8 myself; that the party was represented by counsel as
9 appears herein; That the within
10 transcript is a true record of the Examination Before
11 Trial of said witness;

12 That I am not connected by blood or marriage
13 with any of the parties; that I am not interested
14 directly or indirectly in the outcome of this matter;
15 that I am not in the employ of any of the counsel.

16 IN WITNESS WHEREOF, I have hereunto set my
17 hand this 9th day of February, 2022.

18

19 *Brooke E. Perry*

20 BROOKE E. PERRY

21

22

23

24

25

1 ERRATA SHEET

2 CASE NAME: GRAHAM CHASE ROBINSON v. ROBERT DE NIRO
 3 AND CANAL PRODUCTIONS, INC.,

4 DATE OF DEPOSITION: February 9, 2022

5 WITNESS'S NAME: GRAHAM CHASE ROBINSON

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16 _____|_____|_____|_____

17 _____|_____|_____|_____

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19

20 GRAHAM CHASE ROBINSON

21 SUBSCRIBED AND SWORN TO BEFORE ME

22 THIS _____ DAY OF _____, 20__.

23 _____

24 (NOTARY PUBLIC)

MY COMMISSION EXPIRES:

25